IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

RACHEL PATTERSON)	
)	
Plaintiff,)	
)	Civil Action No.
V.)	
)	
LIBERTY MUTUAL INSURANCE)	
COMPANY)	

DEFENDANT LIBERTY MUTUAL INSURANCE COMPANY'S NOTICE OF REMOVAL

COMES NOW the mis-named Defendant, Liberty Mutual Insurance Company ("LMIC"), on behalf of the proper party, LM General Insurance Company ("LM General") and timely files its Notice of Removal pursuant to Fed. R. Civ. P. 81(c) and 28 U.S.C. §§ 1441 and 1446(a) and (b).

The Plaintiff has filed a civil action against LMIC in the State Court of Gwinnett County, Georgia, Civil Action File No. 23-C-01149-S7, (the "underlying action") which is located within the Atlanta Division of the United States District Court for the Northern District of Georgia. See 28 U.S.C. § 90(a)(2).

The Plaintiff filed her Complaint in the underlying action on or about February 21, 2023. (Exhibit "A", Complaint.) The Summons and Complaint was served on Safeco on or about February 27, 2023. (Id.)

3.

In her Complaint, the Plaintiff alleges that she "resides at 1630 Mosaic Way, Smyrna, GA 30080 (the "Property"). (Complaint, ¶ 1.) She further alleges in her Complaint that her "home" was damaged as a result of an incident (hereinafter referred to as the "Incident"). (Complaint, ¶ 4.) The Plaintiff is a resident of, domiciliary of, and citizen of the State of Georgia.¹

4.

Liberty Mutual Insurance Company, the named defendant, is an insurance company organized and existing under the laws of the State of Massachusetts, with

¹ Citizenship means the same as domicile in diversity jurisprudence. <u>Simmons v. Skyway of Ocala</u>, 592 F. Supp. 356, 359 (S.D. Ga. 1984). "For adults, domicile is established by physical presence in a place in connection with a certain state of mind concerning one's intent to remain there." <u>Mississippi Choctaw Indians Band v. Holyfield</u>, 490 U.S. 30, 48, 104 L. Ed. 29, 109 S. Ct. 1597 (1988). The intent associated with domicile "can be proven by any number of objective factors, e.g. payment of taxes, procurement of driver's license, exercise of voting rights, moving of personal belongings, ownership or rental of property, location of family, place of employment, etc." Duff v. Beaty, et al., 804 F. Supp. 332, 335, (N.D. Ga. 1992).

its principal place of business located at 175 Berkeley Street, Boston, Massachusetts. LM General Insurance Company, the insurance company which issued the Policy, is a company organized under the laws of the State of Illinois and for federal court jurisdiction/diversity of citizenship disclosure purposes, its principal place of business is located at 175 Berkeley Street, Boston, Massachusetts. There is no evidence that the Plaintiff is either a citizen of Illinois or Massachusetts.

5.

Therefore, at the time of removal, the Complaint asserts claims by a citizen of the State of Georgia against only a non-citizen Defendant, LMIC, and there is complete diversity of citizenship.

6.

In her Complaint, the Plaintiff makes the following Prayer for Relief:

Plaintiff respectfully requests that this honorable court award damages in the following amounts:

DWELLING - REBUILD: \$81,006.81 DWELLING - WATER MITIGATION: \$5,559.77 FUNGI - MOLD REMEDIATION: \$23,481.92 PERSONAL PROPERTY - DAMAGED ITEMS \$521.12 PERSONAL PROPERTY - PACK-OUT \$19,414.83

(Ex. A, Complaint, Prayer for Reilief.) Plaintiffs also seek to recover "bad-faith" damages pursuant to O.C.G.A. § 33-4-6 which provides for recovery of not more than 50 percent of the liability of the insurer for the loss or \$5,000.00, whichever is

greater. (<u>Id.</u>) Thus, Plaintiff's claim is an amount in controversy which exceeds \$75,000.00, exclusive of interest and costs.

7.

This is a civil action of which this Court has original jurisdiction under the provisions of 28 U.S.C. § 1332 based on complete diversity of citizenship among the parties, where the amount in controversy exceeds \$75,000.00, exclusive of interest and costs, and which may be removed to this Court pursuant to 28 U.S.C. § 1441.

8.

This Notice of Removal is filed within thirty (30) days of the date of service of the Summons and Complaint on the Defendant.

9.

LMIC attaches to this original pleading only, as Exhibit "A," the entire record in the underlying action in the State Court of Gwinnett County, Georgia.

10.

The Undersigned has read this Notice of Removal, and to the best of the Undersigned's knowledge, information and belief, formed after reasonable inquiry, it is well-grounded in fact and is warranted by existing law, and it is not interposed for any improper purpose, such as to harass or to cause unnecessary delay or needless

increase in the cost of litigation.

WHEREFORE, LMIC notifies this Court and the parties hereto that the above-styled action, formerly pending in the State Court of Gwinnett County, Georgia, has been removed therefrom to this Court.

Respectfully submitted, this 29th day of March 2023.

ISENBERG & HEWITT, P.C.

/s/ Hilary W. Hunter
Hilary W. Hunter
Georgia Bar No. 742696
600 Embassy Row, Suite 150
Atlanta, Georgia 30328
(770) 351-4400 Telephone
(770) 828-0100 Facsimile
Attorney for Defendant
Liberty Mutual Insurance Company

EXHIBIT A

Case 1:23-mi-99999-UNA Document 943 Filed 03/29/23 Page 7 of 73

Sheriff Number: 23006525 Court Case Number: 23-C-01149-S7

Date Received: 2/24/2023 Time: 1:22 PM

Special Service Inst:

State of Georgia
Gwinnett County

ATTORNEY'S ADDRESS

RACHEL PATTERSON
PLAINTIFF
VS.
LIBERTY MUTUAL INSURANCE COMPANY
DEFENDANT

GWINNETT COUNTY GEORGIA

NAME AND ADDRESS OF PARTY TO BE SERVED

LIBERTY MUTUAL INSURANCE CO 2 SUN COURT, SUITE 400 PEACHTREE CORNERS. GA 30092

PEACHTREE CORNE		SHERIFF'S ENTR	Y OF SER	VICE		
PERSONAL I have this da	Sex Skin Color y served the defendant	Hair Color	Age	Hgt_ personally w	Wgt vith a copy of the wi	thin action and summons.
NOTORIOUS I have this day served t summons at his most no	he defendant otorious place in this County.				by leaving	a copy of the action and
Delivered same into the	e hands of				described as follo	ows:
SEX	SKIN COLOR	HAIR COLOR		AGE	HGT	WGT
CORPORATION I have this day served the within action and so doing business of said to		12 h 1/2	21	, į	a corpo	oration by leaving a copy of ge of the office and place of
designated in said affid envelope properly addr defendant(s) to answer NON EST Diligent search made at	he above styled affidavit and so avit, and on the same day of su essed to the defendant at the ac said summons at the place state	ich posting by depositi ddress shown in said su ed in the summons.	ng a true commons, w	opy of same in t	he United States Manage affixed thereon	ail, First Class in an n containing notice to the
in the jurisdiction of the SPECIAL PROCESS	is Court.			-		
COMMENTS						
				Date:		
				Time		
					Depu	ty Sheriff

E-FILED IN OFFICE - CL CLERK OF STATE COURT GWINNETT COUNTY, GEORGIA 23-C-01149-S7 2/21/2023 12:18 PM

IN THE STATE COURT OF GWINNETT COUNTY STATE OF GEORGIA

RACHEL PATTERSON	23-C-01149-S7
Plaintiff,	Civil Action No.
v.	
LIBERTY MUTUAL INSURANCE COMPANY	JURY TRIAL DEMANDED
Defendant,	

SUMMONS

TO: LIBERTY MUTUAL INSURANCE COMPANY

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's Attorney, whose name and address is:

Ryan T. Baxter, Esq. Baxter Law Firm, LLC 2400 Herodian Way Suite #220 Smyrna, GA 30080

an Answer to the Complaint which is herewith served upon you, within 30 days after service of this Summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the Complaint.

This 21ST day of February, 2023. 21st day of February, 2023

Tiana P. Garner

Clerk of State Court:

Deputy Clerk

E-FILED IN OFFICE - CL CLERK OF STATE COURT GWINNETT COUNTY, GEORGIA 23-C-01149-S7 2/21/2023 12:18 PM

IN THE STATE COURT OF GWINNETT COUNTY STATE OF GEORGIA

RACHEL PATTERSON)		23-C-01149-S7	
Plaintiff,))	Civil Action No.	23-0-01149-37	
v.)	,		
LIBERTY MUTUAL INSURANCE COMPANY)	JURY TRIAL DE	MANDED	
Defendant,)))			

VERIFIED COMPLAINT

COMES NOW, Rachel Patterson ("Plaintiff") by and through her attorneys, Baxter Law Firm, and herein files her Complaint against Liberty Mutual Insurance Company ("Defendant") and upon personal knowledge and information and belief, allege and respectfully shows the Court the following:

PARTIES

1.

Plaintiff Rachel Patterson is the Plaintiff/policyholder who resides at 1630 Mosaic Way, Smyrna, GA 30080.

Defendant Liberty Mutual Insurance Company is a Foreign Insurance Company whose registered agent in Georgia, Corporation Service Company, is located at 2 Sun Court, Suite 400, Peachtree Corners, GA 30092, in Gwinnett County.

JURISDICTION AND VENUE

3.

Jurisdiction and Venue are proper in this Court because Defendant's registered agent is located in Gwinnett County, GA; Defendant may be served by and through its registered agent in Gwinnett County and because this Court has subject matter jurisdiction over this case.

FACTUAL BACKGROUND

4.

This matter began on April 20, 2022, when Plaintiff's home at 1630 Mosaic Way, Smyrna, GA 30080, sustained water damage due to a sudden and accidental incident that caused damage to Plaintiff's home. The origin of the water discharge was the upper Bathroom.

5.

The Plaintiff hired A-TOTAL Plumbing to repair the plumbing discharge.

6.

Furthermore, Plaintiff hired Floodmasters, a water mitigation company, to mitigate the water damage and prevent the property from further damage.

On April 25, 2022, another water leak was discovered in the Master Bathroom, 1630 Mosaic Way, Smyrna, GA 30080; the water damage was a sudden and accidental incident that caused additional water damage to Plaintiff's home.

8.

On or about April 26, 2022, Plaintiff contacted Defendant and reported the water damage, and made a claim under her homeowner's insurance policy.

9.

Defendant assigned claim number 049221217-01 to the loss that occurred to Plaintiff's home on April 20, 2022.

10.

Defendant assigned claim number 049265223-01 to the loss that occurred to Plaintiff's home on April 25, 2022.

11.

Defendant assigned Ms. Carnesha Stanton as its adjuster to Plaintiff's claims.

Ms. Carnesha Stanton conducted an initial estimate of the damage to Plaintiff's property on or about May 4, 2022.

13.

Defendant elected not to inspect Plaintiff's property for the presence of mold.

14.

Ms. Stanton's initial estimate to conduct the repairs for both claims was \$21,126.80 Combined.

15.

Plaintiff consulted with Limitless Renovations Statewide. According to the contractor,

Defendant's estimate is incomplete and does not reflect/represent the actual water damage.

Plaintiff tried to communicate with Defendant to modify the estimate to reflect a true settlement to repair the damages.

16.

Defendant continued to stonewall Plaintiff and refused to change/modify its estimate.

17.

Due to Defendant's utter refusal to cooperate. Plaintiff was compelled to hire Baxter Law Firm as her attorney in this action.

Baxter Law Firm utilized the services of All Shook Up to evaluate the water damages at the Plaintiff's house.

19.

Based on All Shook Up's evaluation, Defendant missed and overlooked many items. All Shook Up stated that Defendant's estimate is incomplete and does not represent a true reflection of the water damages.

20.

Furthermore, Plaintiff hired E&S Restoration Services to test the air quality. After conducting a mold test, the results showed elevated levels of Aspergillus/Penicillium and Paecilomyces.

21.

On August 27, 2022, E&S Restoration Services completed the mold remediation. The final invoice was submitted to Defendant on September 12, 2022, in the amount of \$23,481.92.

22.

On September 13, 2022, Baxter Law Firm emailed Defendant the Sworn statement In Proof Of Loss. A true and correct copy of the Sworn Statement In Proof Of Loss is attached as 'Exhibit A.' Defendant never addressed/acknowledged the Sworn statement In Proof Of Loss.

On or about September 28, 2022, Defendant hired an independent vendor, "Sedgwick Claims Management Services," to evaluate the water damage. Baxter Law Firm reached out to Sedgwick Claims Management Services and was advised that Sedgwick Claims Management Services assigned the task to SERVPRO. Baxter Law Firm was advised to communicate with Brian Wright, who works for SERVPRO.

24.

Brian Wright inspected Plaintiff's house jointly with All Shook Up. All Shook Up, LLC's representative and Brian Wright discussed the two separate claims and the scope of damage for each claim.

25.

On October 24, 2022, Defendant emailed Baxter Law Firm the evaluation from SERVPRO.

Miraculously, SERVPRO's evaluation is identical to Defendant's estimate.

26.

On November 11, 2022, Baxter Law Firm emailed Defendant a demand letter. A true and correct copy of the demand letter and its attachments are attached to this Complaint¹ as 'Exhibit B'

27.

Defendant never replied or acknowledged the demand letter.

¹ The pictures that were previously provided to Defendant have been removed from this Complaint Exhibit to save space in the Court's system and will be provided upon request/in Discovery.

COUNT I – BREACH OF CONTRACT

28.

Pursuant to the facts stated above, Defendant has breached its contract with Plaintiff by failing to fully compensate Plaintiff and Plaintiff's vendors in accordance with the policy.

COUNT II - FRAUD

29.

Plaintiff restates and incorporates by reference as if fully set forth herein the averments contained in the paragraphs set forth above.

30.

Defendant intentionally and knowingly falsely represented the scope of damage of both of Plaintiff's claims to both Brian Wright and Plaintiff; Defendant did so with the intention of inducing its own vendor, Brian Wright, to produce an estimate identical to its own to confuse Plaintiff; Furthermore, Defendant did so to induce Plaintiff to refrain from acting on her rights to recovery of the remainder of the scope of the work necessary to restore her property to pre-loss condition.

31.

Plaintiff relied on the fraudulent misrepresentations made by Defendant in its vendor's estimate provided by Brian Wright; Plaintiff suffered damages in the form of attorneys' fees in being compelled to hire Baxter Law Firm to investigate the Defendant's fraud.

COUNT III — ATTORNEY'S FEES AND EXPENSES OF LITIGATION

32.

Plaintiff restates and incorporates by reference as if fully set forth herein the averments contained in the paragraphs set forth above.

33.

Plaintiff reserves the right to move to add parties herein. Plaintiff also reserves the right to amend her Complaint based on further investigation and discovery.

34.

By Defendant's actions and conduct as set forth above, Defendant has also acted in bad faith, been stubbornly litigious and have caused Plaintiff unnecessary trouble and expense, entitling Plaintiff to recover its costs and expenses of litigation, including attorney's fees, pursuant to O.C.G.A. §13-6-11 in an amount to be proven at trial.

PRAYER FOR RELIEF

Plaintiff respectfully requests that this honorable court award damages in the following amounts:

DWELLING - REBUILD:	\$81,006.81
DWELLING - WATER MITIGATION:	\$5,559.77
FUNGI – MOLD REMEDIATION:	\$23,481.92
PERSONAL PROPERTY – DAMAGED ITEMS	\$521.12
PERSONAL PROPERTY – PACK-OUT	\$19,414.83

Plaintiff also requests that pursuant to the facts stated above, as well as those facts which will be proven at trial, this Court find that Defendant has acted in bad faith and impose a statutory penalty of 50% of the above-demanded amount pursuant to O.C.G.A. § 33-4-6; Plaintiff requests that Defendant be held liable to pay Plaintiff's costs and reasonable attorneys' fees. Plaintiff's counsel will submit an affidavit of attorney's fees for this Court's review.

Plaintiff also requests any further relief that this honorable Court deems just and proper.

Plaintiff also demands a trial by jury.

Respectfully submitted this February 21, 2023.

/s/Ryan Baxter Ryan Baxter Georgia Bar No. 588243

BAXTER LAW FIRM, LLC 2400 Herodian Way Suite #220 Smyrna, GA 30080 Telephone: (678) 813-1900 ryan@baxlegal.com

Attorney for Plaintiff

EXHIBIT A



Web: Phone: www.BaxLegal.com (678) 813-1900 2400 Herodian Way Ste, 220 Smyrna, GA 30080 Ryan T. Baxter, Esq.* Attorney & Counselor at Law

Tuesday, September 13, 2022

Sworn Statement In Proof Of Loss

WARNING FRAUD PREVENTION: Any person who, knowingly and with intent to defraud any insurance company or other person, files or conceals, for the purpose of misleading, an application for insurance or a statement of claim containing any materially false information, information concerning any fact material thereto, commits a fraudulent insurance act, which is a crime, and subjects such a person to criminal and civil penalties.

DWELLING PROTECTION: \$237,200

PERSONAL PROPERTY: \$166,040

EFFECTIVE DATE: OCTOBER 19, 2021

COMPANY CLAIM NUMBER: 049221217 & 049265223

DATE EXPIRES: **OCTOBER 19, 2022** POLICY NUMBER: **H3S25117765875**

To: Liberty Mutual Insurance

At the time of loss, by the above-indicated policy of insurance, you insured the interest of Rachel Patterson, 1630 Mosaic Way Smyrna GA 30080-3711, against loss by **WATER DAMAGE** to the property described according to the terms and conditions of the said policy and of all forms, endorsements, transfers, and assignments attached thereto.

• ORIGIN:

Regarding Claim 049221217, the WATER DAMAGE occurred about/on the 20th day of April 2022 at 12:00 AM Eastern Time; the cause and origin of the said loss was: Water Damage.

Regarding Claim 049265223, the WATER DAMAGE occurred about/on the 25th day of April 2022 at 12:45 PM Eastern Time; the cause and origin of the said loss was: Water Damage.

OCCUPANCY:

The building described, or containing the property described, was occupied at the time of the loss as follows, and for no other purpose whatever: Residential "Primary residence" by Insured and her family members (Primary).

TITLE AND INTEREST:

At the time of loss, the named insured has an insurable interest in the property described in the above policy number. No other persons had any interest therein or encumbrance thereon, except: The mortgage company (if applicable).

CHANGES:

Since the said policy was issued, there has been no assignment thereof, or change of interest, use, occupancy, possession, location, or exposure or the property described.

TOTAL INSURANCE:

THE TOTAL AMOUNT OF INSURANCE upon the property described by this policy was, at the time of the loss, more than/or equal to \$403,240 as specified in the Policy.

• LOSS:

THE WATER DAMAGE/LOSS IS: \$129,984.45; this amount does not include the Loss of Use (Additional Living Expenses).

• AMOUNT CLAIMED:

THE AMOUNT CLAIMED under the above-numbered policy is: \$129,984.45. The Loss of Use will be calculated later. This amount pertains to the following:

0	Dwelling - Rebuild Only:	RCV: \$81,006.81	ACV: 74.517.01
0	Dwelling – Mitigation	\$5,559,77	11101
0	Fungi – Mold Remediation	\$23,481,92	
0	Personal Property – Damaged items	\$521.12	
0	Personal Property – Pack-out	\$19,414.83	

STATEMENTS OF INSURED:

The said loss did not originate by any act, design, or procurement on the part of your insured or this affiant. Nothing has been done by or with the privity or consent of your insured or this affiant to violate the conditions of the policy or render it void. No articles are mentioned herein or in annexed schedules, but such as were destroyed or damaged at the time of said loss. No property saved has in any manner been concealed, and no attempt was made to deceive the said insurance company. Any other information that may be required will be furnished and considered a part of this proof.

It is expressly understood and agreed that the furnishings of this form to the insurer, the insured or the Attorney, or any agent of the insured in the making of this proof is not a waiver of any rights of said insured or of any of the conditions of this policy.

Additional Note:

The Insured fully intends to comply with all terms and conditions of the subject policy. Moreover, the Insured fully reserves all her rights under the subject policy, with the understanding that any actions taken do not constitute a waiver of any such rights.

Furthermore, in the event of newly discovered and/or additional information obtained, the Insured fully reserves her right to modify, revise, amend and/or supplement any documentation and/or statement produced. Additionally, the Insured fully reserves her right to correct, modify, revise, amend and/or supplement any information produced in error.

State of Georgia

Sworn to and subscribed before me this 13th day of September 2022

Rachel Patterson "Insured"

Notary Public

YONG W JUNG Notary Public - State of Georgia Gwinnett County My Commission Expires Jan 29, 2023

EXHIBIT B



Web: Phone: www.BaxLegal.com (678) 813-1900 2400 Herodian Way Ste. 220 Smyrna, GA 30080 Ryan T. Baxter, Esq.* Attorney & Counselor at Law

Friday, November 11, 2022

Liberty Mutual 2 SUN COURT, SUITE 400 PEACHTREE CORNERS, GA 30092

Sent Via Email
CARNESHA.STANTON@libertymutual.com
imaging@libertymutual.com

Re:

Property Owner:

Rachel Patterson

Policy Number:

H3S25117765875

Claim Number:

049221217 & 049265223

Date of Loss:

April 20, 2022, & April 25, 2022

Dear Carnesha Stanton,

As you know, I have been retained by Rachel Patterson to represent her interests regarding the above-referenced property insurance claims. All further communication regarding this claim should be directed to my office.

My client has complied with all conditions contained in the insurance policy. My client is at a loss as to why Liberty Mutual Insurance ("Liberty Mutual") has not afforded the proper coverage under the applicable policy. This lack of good faith has forced Ms. Patterson to retain my legal services in order to fairly settle her claim. It is our belief that Liberty Mutual has violated the Unfair Claims Settlement Practice Act pursuant to O.C.G.A. § 33-6-34, and has breached the insurance policy contract.

Bad faith claims handling triggers additional liability on your part under O.C.G.A. § 33-4-6 that includes the amount of the claim, plus a penalty of up to an additional fifty percent (50%) of the value of the claim and reasonable attorneys' fees and costs.

<u>Unfortunately, Liberty Mutual has wrongfully delayed and improperly adjusted Two (2)</u> <u>Elements of Ms. Patterson's claim as follows:</u>

DWELLING - REBUILD:

Please find enclosed an estimate of damages for Ms. Patterson's Dwelling-Rebuild in the amount of \$81,006.81.

The total ACV amounts that have been paid by Liberty Mutual do not reflect a true evaluation to rebuild Ms. Patterson's home.

Liberty Mutual purposefully delayed this process by conducting an unreasonable investigation.

Liberty Mutual is deliberately bullying the insured by conducting an unreasonable investigation and putting the insured through unnecessary hoops to force her to give up on the claim. Moreover, Liberty Mutual's final estimate is clearly incomplete and does not represent a true evaluation of the water damage.

Thus far, Liberty Mutual has not attempted to discuss the rebuild estimate properly and try to reach an agreement. Instead, Liberty Mutual hired Servpro to validate Liberty Mutual's estimate.

Liberty Mutual hired Servpro to provide an estimate as a third party; moreover, it appears that Servpro used Liberty Mutual's evaluation and made minor changes. Again, Servpro's evaluation should have been independent and not influenced by Liberty Mutual.

As part of the rebuild process, the personal property must be packed-out. This task falls under Coverage A (Dwelling). Please find the enclosed estimate for the pack-out in the amount of \$19,414.83. The pack-out is not incurred yet; however, we are including the estimate in this demand letter.

Therefore, as per the enclosed detailed estimate of damages to Ms. Patterson's property, we are hereby making a formal demand that you settle Ms. Patterson's Dwelling-Rebuild portion of the claim for the sum of \$81,006.81 and \$19,414.83 for the pack-out. The estimates are attached for your review. This demand is being made pursuant to O.C.G.A. § 33-4-6, and you have sixty (60) days in which to make payment on this claim or be subject to a lawsuit containing a claim for breach of contract and bad faith seeking all compensation allowed by law, including attorneys' fees and penalty of up to fifty percent (50%) of the loss amount.

MOLD REMEDIATION:

Please find enclosed an invoice for Mol Remediation Services rendered for Ms. Patterson's Mold Remediation in the amount of \$23,481.92. Our records indicate that Liberty Mutual is going to issue a partial payment on my client's Mold Remediation in the amount of \$8,587.75.

According to the Policy's Terms and Conditions, Liberty Mutual is obligated to pay the Mold Remediation Invoice on behalf of the Insured; therefore, Liberty Mutual should pay "E&S Restoration" an additional \$14,894.17 to satisfy the invoice.

Therefore, as per the enclosed detailed invoice of Mold Remediation for Ms. Patterson's property, we are hereby making a formal demand that you settle Ms. Patterson's Mold Remediation portion of the claim for the sum of \$23,481.92. The invoice for Mold Remediation is attached for your review. This demand is being made pursuant to O.C.G.A. § 33-4-6, and you have sixty (60) days in which to make payment on this claim or be subject to a lawsuit containing a claim for breach of contract and bad faith seeking all compensation allowed by law, including attorneys' fees and penalty of up to fifty percent (50%) of the loss amount.

ATTORNEY'S FEES:

Liberty Mutual is deliberately bullying the insured by conducting an unreasonable investigation and by putting the insured through unnecessary hoops to force her to give up on the claim. Liberty Mutual's unreasonable behavior compelled the insured to hire an attorney.

As of today, the attorney's fees are \$15,000 and we hereby demand Liberty Mutual pay such fees. This demand is being made pursuant to O.C.G.A. § 33-4-6, and you have sixty (60) days in which to make payment on this claim or be subject to a lawsuit containing a claim for breach of contract and bad faith seeking all compensation allowed by law, including attorneys' fees and penalty of up to fifty percent (50%) of the loss amount.

DEMAND:

This letter constitutes a "Proper Demand" for payment under O.C.G.A. § 33-4-6. If you contend that a proper demand has not been made, you must immediately notify this firm of the reasons for such contention. Otherwise, it will be assumed that you agree that a proper demand was made.

The purpose of this correspondence is to encourage Liberty Mutual to resolve Ms. Patterson's claim in a fair and equitable manner to avoid litigation. In the event that you fail to respond to this letter with an offer of settlement that is acceptable to Ms. Patterson, this firm will have no alternative but to recommend to Ms. Patterson that a lawsuit be filed against Liberty Mutual.

In order to avoid a suit for bad faith penalties and attorney's fees, payment must be received in my office within sixty (60) days of your receipt of this letter. Any check issued should list **Baxter Law Firm, LLC**.

<u>I look forward to working with you to resolve this matter quickly and amicably.</u> Please feel free to contact me should you have any questions regarding this formal 60-day demand.

Govern Yourselves Accordingly,

/s/ Ryan Baxter

Ryan T. Baxter, Esq.

All Shook Up

8841 Bright Star Road Douglasville, GA 30134

Phone: 404-408-2912 Fax: 404-393-1755





Monday, September 12, 2022

Insurance Company:

Liberty Mutual Insurance

Policy:

H3S25117765875

Claim:

049221217 & 049265223

Date of loss:

April 20, 2022 & April 25, 2022

Insured:

Rachel Patterson

Loss Location:

1630 Mosaic Way Smyrna, GA 30080

Repair Estimate & Evaluation

The Risk/Townhouse has sustained water damage. The water overflow source was Upper Level; therefore, the Risk/Townhouse sustained water damage or was impacted by water damage to the following areas:

Upper Level

- Master Bathroom
- Master Toilet
- Shower Area
- Master Closet
- Spare Bedroom
- Bathroom
- Hallway, continuous walls to the stairwell

Main Level

- Entry
- Stairwell
- Foyer
- Foyer closet
- Half Bathroom
- Kitchen & Living Room
- Pantry
- Stairwell to Upper Level

Lower Level

- Garage
- Entry from Garage

Repair Estimate:

- Our repair estimate is based on the actual water loss.
- We have prepared a repair estimate that reflects the most effective method of repair.
- The Personal Property must be packed-out and temporalty stored during the rebuild process.

The Homeowner and All Shook Up fully reserve their right to modify, revise, amend and/or supplement any documentation and/or statement produced.

Additionally, the Homeowner and All Shook Up fully reserve their right to correct, modify, revise, amend and/or supplement any information produced in error.

Respectfully,

All Shook Up, LLC Elvis Dafrawi 8841 Bright Star Road Douglasville GA 30134 404-408-2912

> Scroll down for more





: Rachel Patterson

LOCATION : 1630 Mosaic Way : Smyrna, GA 30080

COMPANY : Liberty Mutual : PO BOX 5014

: SCRANTON, PA 18505

DATE OF REPORT

: 09/13/2022

DATE OF LOSS

: 04/20/2022 : H3S25117765875

POLICY NUMBER CLAIM NUMBER OUR FILE NUMBER

: 049221217 & 049265223 : 049221217 & 049265223

ADJUSTER NAME : Carnesha Stanton

Main Grouping: Sub-group #1:

Water Damage Dwelling - Rebuild

Sub-group #2:

Lower Level Garage

Estimate Section:

Garage 12' 9.0" x 37' 1.0" x 9'

The walls are different colors and will require

additional paint and materials.

Garage Door 10' x 7'

	Lower Perime Upper Perime		472.80 S 52.53 S			07.00 SF 72.80 SF
#	Quantity	Description	Unit Cost	RCV	DEP	ACV
1	6.0 EA	Detach and Reset Cover Plate for Outlet / Switch To Paint Ceiling and Walls.	\$3.78	\$22.68		\$22.68
2		Remove Ceiling Drywall on Wood Framing Entire Ceiling Drywall was compromised by water damage.	\$1.22	\$576.82		\$576.82
3	1.0 EA	Add for Additional Drywall Labor to Cut Around				
		Fire Sprinklers For Drywall Removal	\$89.18	\$89.18		\$89.18
4	472.8 SF	Remove Ceiling Paper-Faced Batt Insulation	\$0.42	\$198.58		\$198.58
5	472.8 SF	Apply Botanical Anti-Microbial Spray (Ceiling) After Ceiling Drywall Removal. Due to water exposure in ceiling cavity, the ceiling cavity must be treated with a Botanical Anti-Microbial Spray.	\$0.51	\$241.13		\$241.13
6	472.8 SF	Replace Ceiling Paper-Faced Batt Insulation	\$2.26	\$1,068.53	\$21.37	\$1,047.16
7		Replace Ceiling Drywall on Wood Framing	\$3.17	\$1,498.78		\$1,468.80
8		Seal Ceiling	\$0.55	\$260.04		\$260.04
9		Paint Ceiling	\$1.26	\$595.73	\$166.80	\$428.93
10		Remove Pre-Wired Smoke Detector	\$6.20	\$6.20		\$6.20
11 12		Replace Pre-Wired Smoke Detector Remove Better Quality Ceiling / Wall Light	\$124.29	\$124.29	·	\$114.35
13	2.0 EA	Fixture Replace Better Quality Ceiling / Wall Light	\$8.86	\$17.72		\$17.72
14	1.0 EA	Fixture Detach 9' Aluminum Sectional Garage Door -	\$181.07	\$362.14	\$36.21	\$325.93
		4 Panel	\$64.33	\$64.33		\$64.33
15		Reset 9' Aluminum Sectional Garage Door - 4 Panel	\$307.36	\$307.36		
16	1 0 FA	Detach Electric Opener for Garage Door	\$61.86	\$61.86		\$307.36 \$61.86
17		Reset Electric Opener for Garage Door	\$301.60	\$301.60		\$301.60
18		Detach Springs for Garage Door	\$57.89	\$115.78		\$115.78
19		Reset Springs for Garage Door	\$227.70	\$455.40		\$455.40
20	1.0 EA	Hardware for Garage Door	\$59.63	\$59.63		\$59.63
21		Reset Mounting System for Garage Door	\$253.16	\$253.16		\$253.16
22		Paint Walls	\$1.12	\$903.84	\$253.08	\$650.76
23		Add for Additional Paint Colors - Paint Walls	\$0.61	\$492.27	\$137.84	\$354.43
- 1		The season beautiful to the season of the se		•	1	•



: Rachel Patterson

LOCATION: 1630 Mosaic Way

: Smyrna, GA 30080

COMPANY : Liberty Mutual

: PO BOX 5014 : SCRANTON, PA 18505 DATE OF REPORT DATE OF LOSS

: 09/13/2022 : 04/20/2022

POLICY NUMBER CLAIM NUMBER

: H3S25117765875 : 049221217 & 049265223

OUR FILE NUMBER

: 049221217 & 049265223

ADJUSTER NAME

: Carnesha Stanton

Estima	Estimate Section: Water Damage : Dwelling - Rebuild : Lower Level : Garage - Continued						
#	Quantity	Description	Unit Cost	RCV	DEP	ACV	
24	86.7 LF Ta	ape and Mask for Paint	\$0.83	\$71.96		\$71.96	
25	472.8 SF Fi	nal Construction Clean-up	\$0.54	\$255.31		\$255.31	
		Totals For Garage		\$8,404.32	\$655.22	\$7,749.10	

Main Grouping: Sub-group #1:

Water Damage Dwelling - Rebuild

Sub-group #2: **Estimate Section:** Lower Level **Entry from Garage**

Entry from Garage 6' 9.0" x 4' 9.0" x 9'

L	ower Perime	ter: 23.00 LF	Floor SF:	32.10 SF	1	Vall SF: 207	.00 SF
ι	Jpper Perime	ter: 23.00 LF	Floor SY:	3.57 SY	Ce	iling SF: 32	.10 SF
#	Quantity	Description	<u> </u>	Unit Cost	RCV	DEP	ACV
26	4.0 EA	Detach and Reset Cover Plate	e for Outlet /				
		Switch To Paint Walls.		\$3.78	\$15.12		\$15.12
27	23.0 LF	Paint / Finish Shoe Moulding Moulding is Continuous to St	airwav Moulding	\$1.15	\$26.45	\$7.41	\$19.04
28	23.0 LF	Paint / Finish Base Moulding Moulding is Continuous to St	,	\$1.14	\$26.22	\$7.34	\$18.88
29	23.0 LF	Tape and Mask for Paint		\$0.83	\$19.09		\$19.09
30	207.0 SF	Paint Walls Walls are Continuous to Stai	rway Walls	\$1.12	\$231.84	\$64.92	\$166.92
31	32.1 SF	Paint Ceiling Ceiling is Continuous to Stair	way Ceiling	\$1.26	\$40.45	\$11.33	\$29.12
32	2.0 EA	Paint / Finish Interior Door Ca	sing / Trim Set	044.00	***		.
		(One Side Only) Door Trim is Continuous to M	loulding	\$11.62	\$23.24	\$6.51	\$16.73
33	32.1 SF	Final Construction Clean-up		\$0.54	\$17.33		\$17.33

Main Grouping:

Water Damage

Sub-group #1: Sub-group #2: **Dwelling - Rebuild** Main Level

Estimate Section:

Entry

4' 9.0" x 10' 8.0" x 14' 4.0"

Totals For Entry from Garage

Lower Perimeter: **Upper Perimeter:** 38.50 LF

Floor SF:

68.90 SF

Wall SF:

510.90 SF

43.30 LF

Floor SY:

7.66 SY

Ceiling SF:

68.90 SF

Quantity Description

Unit Cost

RCV

\$399.74

\$97.51

ACV

\$302.23



: Rachel Patterson

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COMPANY: Liberty Mutual

: PO BOX 5014

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: 04/20/2022 : H3S25117765875

POLICY NUMBER CLAIM NUMBER

: 049221217 & 049265223

OUR FILE NUMBER : 049221217 & 049265223

ADJUSTER NAME : Carnesha Stanton

#	Quantity	Description	Unit Cost	RCV	DEP	ACV
34	8.0 EA	Detach and Reset Cover Plate for Outlet /				
		Switch	\$3.78	\$30.24	•	\$30.2
		To Paint Walls.	Ψ0.70	Ψ00.2-7		Ψ30.2
35	38515	Remove Shoe Moulding	\$0.63	¢24.26		604.0
33	30.3 Li	Must remove to Sand and Finish Floors	Ф 0.03	\$24.26		\$24.2
36	20 5 1 5		* 0.00	£444.07	00.00	\$ 400.0
37	30.3 LF	Replace Shoe Moulding Seal Shoe Moulding	\$2.89	\$111.27	\$2.23	\$109.0
	30.5 LF	Seal Shoe Moulding	\$0.74	\$28.49	\$0.57	\$27.9
38		Paint / Finish Shoe Moulding	\$1.15	\$44.28	\$12.40	\$31.8
39	38.5 LF	Paint / Finish Base Moulding	\$1.14	\$43.89	\$12.29	\$31.6
		Moulding is Continuous to Foyer Moulding				
40	17.2 SF	Tear Out and Bag Wood Flooring - Hardwood	\$2.72	\$46.78		\$46.7
		Water Damaged. Floor is warping and				
		separating				
41	17.2 SF	Tear Out Tar-Paper/Vapor Barrier for Wood			1	
		Flooring	\$0.46	\$7.91	\$0.16	` \$7.7
42	17.2 SF	Replace Tar-Paper/Vapor Barrier for Wood				
		Flooring	\$0.67	\$11.52		\$11.5
43	17.2 SF	Replace Wood Flooring - Hardwood	\$10.21	\$175.61	\$7.02	\$168.5
44		Wood Flooring - Sand and Finish	\$4.16	\$286.62	\$37.26	\$249.3
	_	Wood Flooring is Continuous Throughout	V	\$250.02	Ψ01.20	Ψ2-10.0
		Main Level			ĺ	
45	68 9 SE	Add for Dustless Sanding Equipment Wood				
10		Flooring - Sand and Finish	\$2.20	\$151.58	¢40.74	#424.0
46		Lacquer Coat for Wood Floor			\$19.71	\$131.8
40	00.9 31	Two Coats	\$2.24	\$154.34	\$20.06	\$134.2
47	20 5 1 5		00.00	004.00		
47		Tape and Mask for Paint	\$0.83	\$31.96		\$31.9
48	510.9 SF	Paint Walls	\$1.12	\$572.21	\$160.22	\$411.9
		Walls are Continuous to Foyer Walls				
49	68.9 SF	Remove Ceiling Drywall on Wood Framing	\$1.22	\$84.06		\$84.0
ļ		Ceiling Drywall was compromised by water				
i		damage.				
50	1.0 EA	Add for Additional Drywall Labor to Cut Around				
		Fire Sprinklers	\$89.19	\$89.19		\$89.1
51	68.9 SF	Replace Ceiling Drywall on Wood Framing	\$3.17	\$218.41	\$4.37	\$214.0
52	68.9 SF	Seal Ceiling	\$0.55	\$37.90	*	\$37.9
53		Paint Ceiling	\$1.26	\$86.81	\$24.31	\$62.5
		Ceiling is Continuous to Foyer Ceiling	V 20	Ψ00.01	Ψ2-7.01	Ψ02.0
54	43.31F	Tear Out - Crown Moulding, Keystone, Large	\$0.68	\$29.44		\$29.4
•	40.0 21	To remove ceiling drywall	Ψ0.00	φ25.44		Φ2 8.44
55	4331E	Replace Crown Moulding, Keystone, Large	\$19.42	\$840.89	¢46.00	#004 0
56		Inside/Outside Corner Cut for Crown Moulding		*	\$16.82	\$824.0
			\$8.48	\$8.48	\$0.17	\$8.3
57		Seal Crown Moulding	\$1.14	\$49.36	\$0.99	\$48.3
58	43.3 LF	Paint / Finish Crown Moulding	\$1.44	\$62.35	\$17.46	\$44.8
		Moulding is Continuous to Foyer Moulding				
59	1.0 EA	Remove Chandelier	\$27.70	\$27.70		\$27.7



: Rachel Patterson

LOCATION : 1630 Mosaic Way

: Smyrna, GA 30080

DATE OF LOSS POLICY NUMBER

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COMPANY : Liberty Mutual

CLAIM NUMBER : PO BOX 5014

OUR FILE NUMBER : 049221217 & 049265223

: H3S25117765875 : 049221217 & 049265223

: SCRANTON, PA 18505

ADJUSTER NAME : Carnesha Stanton

#	Quantity	Description	Unit Cost	RCV	DEP	ACV
60	1.0 EA	Replace Chandelier Single Bulb - Modern Glass Style Ceiling Chandelier was Compromised and Damaged by Water. Any electronics and light fixtures exposed to water must be replaced.	\$406.12	\$406.12	\$40.61	\$365.51
61	1.0 EA	Paint / Finish Interior Door Casing / Trim Set (One Side Only) Door trim is continuous to moulding	\$11.62	\$11.62	\$3.25	\$8.37
62	68.9 SF	Final Construction Clean-up	\$0.54	\$37.21		\$37.21
63		Apply Botanical Anti-Microbial Spray (Ceiling) After Ceiling Drywall Removal. Due to water exposure in ceiling cavity, the ceiling cavity must be treated with a Botanical Anti-Microbial Spray.	\$0.51	\$35.14		\$35.14
		Totals For Entry		\$3,745.64	\$379.90	\$3,365,74

Main Grouping:

Water Damage

Sub-group #1: Sub-group #2:

Dwelling - Rebuild

Estimate Section:

Main Level

Stairwell to Lower Level Entry

L	ower Perime	ter: 38.80 LF	Floor SF:	54.70 SF	V	Vall SF: 401	.30 SF
ι	Ipper Perime	ter: 38.80 LF	Floor SY:	6.08 SY	Cei		.70 SF
#	Quantity	Description		Unit Cost	RCV	DEP	ACV
64	2.0 EA	Detach and Reset Cover Plate	e for Outlet /				
		Switch To Paint Walls.		\$3.78	\$7.56		\$7.56
65	38.8 LF	Paint / Finish Skirtboard Mould Moulding is Continuous to Fo	•	\$2.14	\$83.03	\$23.25	\$59.78
66	54.7 SF	Wood Flooring - Sand and Fin Wood Flooring is Continuous Main Level		\$4.16	\$227.55	\$29.58	\$197.97
67		Add for Dustless Sanding Equ	ipment Wood				
		Flooring - Sand and Finish		\$2.20	\$120.34	\$15.64	\$104.70
68	54.7 SF	Lacquer Coat for Wood Floor Two Coats		\$2.24	\$122.53	\$15.93	\$106.60
69	38.8 LF	Tape and Mask for Paint		\$0.83	\$32.20		\$32.20
70	401.3 SF	Paint Walls Walls are Continuous to Foye	er Walis	\$1.12	\$449.46	\$125.85	\$323.61
71	54.7 SF	Paint Ceiling Ceiling is Continuous to Foye		\$1.26	\$68.92	\$19.30	\$49.62
72	1.0 EA	Detach Ceiling / Wall Light Fixt		\$18.86	\$18.86		\$18.86
73		Reset Ceiling / Wall Light Fixtu		\$116.56	\$116.56		\$116.56
74		Final Construction Clean-up		\$0.54	\$29.54		\$29.54
		Totals For Stairwell to Lov	wer Level Entry		\$1,276.55	\$229.55	\$1,047.00



: Rachel Patterson

LOCATION : 1630 Mosaic Way

: Smyrna, GA 30080 COMPANY: Liberty Mutual

: PO BOX 5014

: SCRANTON, PA 18505

DATE OF REPORT DATE OF LOSS

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: 04/20/2022

POLICY NUMBER : H3S25117765875

CLAIM NUMBER : 049221217 & 049265223 OUR FILE NUMBER : 049221217 & 049265223

ADJUSTER NAME : Carnesha Stanton

Main Grouping: Sub-group #1:

Water Damage Dwelling - Rebuild

Sub-group #2: **Estimate Section:** **Main Level** Foyer

royer	13' 6.0" x 11' 1.0" x 9'
Foyer Hallway	8' 4.0" x 6' 9.0" x 9'

	.ower Perime Jpper Perime		205.90 SF 22.88 SY			92.50 SF 05.90 SF
#	Quantity	Description	Unit Cost	RCV	DEP	ACV
75	7.0 EA	Detach and Reset Cover Plate for Outlet /				
		Switch	\$3.78	\$26.46		\$26.46
		To Paint Walls.				
76	65.8 LF	Remove Shoe Moulding	\$0.63	\$41.45		\$41.45
77	65.015	Must Remove to Sand and Finish Floors	00.00	0100.10		•
78		Replace Shoe Moulding Seal Shoe Moulding	\$2.89	\$190.16		\$186.36
79		Paint / Finish Shoe Moulding	\$0.74 \$1.15	\$48.69	\$0.97	\$47.72
, ,	03.8 LF	Moulding is Continuous to Kitchen, Living	\$1.15	\$75.67	\$21.19	\$54.48
l í		Room, and Entry Moulding				
80	16.5 LF	Replace Base Moulding	\$5.73	\$94.55	\$1.89	\$92.66
		Large Base Moulding	ψο., σ	ψ04.00	ψ1.09	ψ92.00
81	16.5 LF	Seal Base Moulding	\$0.98	\$16.17	\$0.32	\$15.85
82		Caulk Base Moulding	\$0.94	\$61.85	\$1.24	\$60.61
83		Paint / Finish Base Moulding	\$1.14	\$75.01	\$21.00	\$54.01
		Moulding is Continuous to Kitchen, Living		·		*
		Room, and Entry Moulding				
84	103.0 SF	Tear Out and Bag Wood Flooring - Hardwood	\$2.72	\$280.16		\$280.16
i i		Water Damaged. Floor is warping and				
		separating				
85	103.0 SF	Tear Out Tar-Paper/Vapor Barrier for Wood				
	400.00	Flooring	\$0.46	\$47.38	\$0.95	\$46.43
86		Replace Tar-Paper/Vapor Barrier for Wood	40.07	***		
87		Flooring	\$0.67	\$69.01		\$69.01
88		Replace Wood Flooring - Hardwood	\$10.21	\$1,051.63	\$42.07	\$1,009.56
86	205.9 5	Wood Flooring - Sand and Finish Wood Flooring is Continuous Throughout	\$4.16	\$856.54	\$111.35	\$745.19
		Main Level				
89	205 9 SE	Add for Dustless Sanding Equipment Wood				
00	200.0 01	Flooring - Sand and Finish	\$2.20	\$452.98	\$58.89	\$394.09
90	205.9 SF	Lacquer Coat for Wood Floor	\$2.24	\$461.22	\$59.96	\$401.26
		Two Coats	Ψ2.24	Ψ-01.22	Ψυσ.συ	Ψ401.20
91	65.8 LF	Tape and Mask for Paint	\$0.83	\$54.61		\$54.61
92		Paint Walls	\$1.12	\$663.60	\$185.81	\$477.79
		Walls are Continuous to Kitchen, Living	¥	4 000.00	Ψ100.01	Ψτιτισ
		Room, and Entry Walls				
93	205.9 SF	Remove Ceiling Drywall on Wood Framing	\$1.22	\$251.20		\$251.20
94	2.0 EA	Add for Additional Drywall Labor to Cut Around				,·
		Fire Sprinklers	\$89.19	\$178.38		\$178.38



: Rachel Patterson

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LOCATION : 1630 Mosaic Way : Smyrna, GA 30080

POLICY NUMBER

: 04/20/2022 : H3S25117765875

COMPANY : Liberty Mutual

CLAIM NUMBER

: 049221217 & 049265223 OUR FILE NUMBER : 049221217 & 049265223

: PO BOX 5014 : SCRANTON, PA 18505

ADJUSTER NAME

: Carnesha Stanton

#	Quantity	Description	Unit Cost	RCV	DEP	ACV
95		Apply Botanical Anti-Microbial Spray (Ceiling) After Ceiling Drywall Removal. Due to water exposure in ceiling cavity, the ceiling cavity must be treated with a Botanical Anti-Microbial Spray.	\$0.51	\$105.01		\$105.01
96	205.9 SF	Replace Ceiling Drywall on Wood Framing	\$3.17	\$652.70	\$13.05	\$639.65
97	205.9 SF	Seal Ceiling	\$0.55	\$113.25		\$113.25
98	205.9 SF	Paint Ceiling Ceiling is Continuous to Kitchen, Living Room, and Entry Ceiling	\$1.26	\$259.43	\$72.64	\$186.79
99		Tear Out - Crown Moulding, Keystone, Large To remove ceiling drywall	\$0.68	\$44.74		\$44.74
100		Replace Crown Moulding, Keystone, Large	\$19.42	\$1,277.84	\$25.56	\$1,252.28
101		Inside/Outside Corner Cut for Crown Moulding	\$8.48	\$152.64	\$3.05	\$149.59
102		Seal Crown Moulding	\$1.14	\$75.01	\$1.50	\$73.51
103	65.8 LF	Paint / Finish Crown Moulding Moulding is Continuous to Kitchen, Living Room, and Entry Moulding	\$1.44	\$94.75	\$26.53	\$68.22
104	2.0 EA	Remove Chandelier	\$27.70	\$55.40		\$55.40
105		Replace Chandelier Single Bulb - Modern Glass Style Ceiling Chandelier was Compromised and Damaged by Water. Any electronics and light fixtures exposed to water must be replaced.	\$406.12	\$812.24	\$81.22	\$731.02
106		Remove Premium Quality Chandelier Replace Premium Quality Chandelier 5 LED Lit - Modern Glass and Chrome Style Ceiling Chandelier was Compromised and Damaged by Water. Any electronics and light fixtures exposed to water must be replaced.	\$27.70 \$1,077.40	\$27.70 \$1,077.40	\$107.74	\$27.70 \$969.66
108	1.0 EA	Detach and Reset Curtain Rod for Double Window	\$34.16	\$34.16		\$34.16
109		Additional Cost for additional paint color for Chair-Rail Moulding and Decorative moulding	\$2.79	\$183.58	\$51.40	\$132.18
110		Detach Ceiling / Wall Light Fixture	\$18.86	\$18.86	Ψ01110	\$18.86
111		Reset Ceiling / Wall Light Fixture	\$116.56	\$116.56		\$116.56
112		Remove Pre-Wired Smoke Detector	\$6.20	\$6.20		\$6.20
113		Replace Pre-Wired Smoke Detector Any electronics exposed to water must be replaced.	\$124.29	\$124.29	\$9.94	\$114.35
114		Paint / Finish Interior Door Casing / Trim Set (One Side Only) Door Trim is Continuous to Moulding	\$11.62	\$23.24	\$6.51	\$16.73
115	205.9 SF	Final Construction Clean-up	\$0.54	\$111.19		\$111.19
		Totals For Foyer		\$10,362.91	\$908.58	\$9,454.33



: Rachel Patterson

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COMPANY: Liberty Mutual : PO BOX 5014

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CLAIM NUMBER

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OUR FILE NUMBER : 049221217 & 049265223

ADJUSTER NAME : Carnesha Stanton

Main Grouping: Sub-group #1:

Water Damage Dwelling - Rebuild

Sub-group #2: **Estimate Section:** Main Level **Foyer Closet**

Foyer Closet 3' 4.0" x 2' 1.0" x 9'

-	ower Perimeter: pper Perimeter:	10.80 LF 10.80 LF	Floor SF: Floor SY:	6.90 SF 0.77 SY		Vall SF: iling SF:	97.50 SF 6.90 SF
#	Quantity	Description	n	Unit Cost	RCV	DEP	ACV
116		ve Shoe Moulding Remove to Sand and F	Finish Floors	\$0.63	\$6.80		\$6.80
117	10.8 LF Repla	ce Shoe Moulding		\$2.89	\$31.21	\$0.62	\$30.59
118	10.8 LF Seal S	Seal Shoe Moulding			\$7.99	\$0.16	\$7.83
119	10.8 LF Paint	/ Finish Shoe Moulding		\$1.15	\$12.42	\$3.48	\$8.94
120	10.8 LF Paint	/ Finish Base Moulding		\$1.14	\$12.31	\$3.45	\$8.86
121	Wate	Out and Bag Wood Floor or Damaged. Floor is wa rating		\$2.72	\$18.77	,	\$18.77
122	6.9 SF Tear (Out Tar-Paper/Vapor Ba	arrier for Wood				
	Floori	ng		\$0.46	\$3.17	\$0.06	\$3.11
123	6.9 SF Repla	ce Tar-Paper/Vapor Ba	rrier for Wood				·
	Floori	ng		\$0.67	\$4.62		\$4.62
124	6.9 SF Repla	ce Wood Flooring - Har	dwood	\$10.21	\$70.45	\$2.82	\$67.63
125	Wood	Flooring - Sand and Fi d Flooring is Continuous Level		\$4.16	\$28.70	\$3.73	\$24.97
126	6.9 SF Add fo	or Dustless Sanding Eq	uipment Wood				
		ng - Sand and Finish	·	\$2.20	\$15.18	\$1.97	\$13.21
127		Lacquer Coat for Wood Floor Two Coats		\$2.24	\$15.46	\$2.01	\$13.45
128	(One	/ Finish Interior Door Ca Side Only)	-	\$11.62	\$11.62	\$3.25	\$8.37
129	1.0 EA Detac	Trim is Continuous to Note that he had been core to the help of th	oor Only)	\$16.37	\$16.37		\$16.37
130		Hollow Core Door (Doo	or Only)	\$38.66	\$38.66		\$38.66
131		Construction Clean-up	,	\$0.54	\$3.73		\$3.73
		Totals I	For Foyer Closet		\$297.46	\$21.55	\$275.91



: Rachel Patterson LOCATION : 1630 Mosaic Way

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: Smyrna, GA 30080

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COMPANY : Liberty Mutual : PO BOX 5014

OUR FILE NUMBER : 049221217 & 049265223

: SCRANTON, PA 18505 ADJUSTER NAME : Carnesha Stanton

Main Grouping: Sub-group #1:

Water Damage Dwelling - Rebuild Main Level

Sub-group #2: **Estimate Section:**

Half Bathroom

Half Bathroom 5' 6.0" x 5' 3.0" x 9' Door 2' 6.0" x 6' 8.0"

_	ower Perimeter:	19.00 LF Floor S	SF: 28.90 SI	F	Wall SF: 176	6.80 SF
L	pper Perimeter:	21.50 LF Floor S	SY: 3.21 S	Y Ce	eiling SF: 28	3.90 SF
#	Quantity	Description	Unit Cost	RCV	DEP	ACV
132	2.0 EA Det	ach and Reset Cover Plate for Outlet /				
	Swi	itch	\$3.78	\$7.56		\$7.56
	То	Paint Walls.				*****
133	19.0 LF Rer	move Shoe Moulding	\$0.63	\$11.97		\$11.97
	Mu	ust Remove to Sand and Finish Floors				•
134	19.0 LF Rep	place Shoe Moulding	\$2.89	\$54.91	\$1.10	\$53.81
135	19.0 LF Sea	al Shoe Moulding	\$0.74	\$14.06	\$0.28	\$13.78
136		nt / Finish Shoe Moulding	\$1.15	\$21.85	\$6.12	\$15.73
137	19.0 LF Pair	nt / Finish Base Moulding	\$1.14	\$21.66	\$6.06	\$15.60
138	Wa sej	r Out and Bag Wood Flooring - Hardwor ater Damaged. Floor is warping and parating		\$78.61		\$78.61
139	28.9 SF Tea	ir Out Tar-Paper/Vapor Barrier for Wood				
		oring	\$0.46	\$13.29	\$0.27	\$13.02
140		place Tar-Paper/Vapor Barrier for Wood				
		oring	\$0.67	\$19.36		\$19.36
141		place Wood Flooring - Hardwood	\$10.21	\$295.07	\$11.80	\$283.27
142	Wo Ma	od Flooring - Sand and Finish ood Flooring is Continuous Throughout iin Level I for Dustless Sanding Equipment Wood	\$4.16	\$120.22	\$15.63	\$104.59
140		oring - Sand and Finish	\$2.20	\$63.58	\$8.27	\$55.31
144		quer Coat for Wood Floor	\$2.24	\$64.74	\$8.42	\$56.32
		o Coats	ΨΖ.Ζ-4	φ04.74	Φ0.4∠	φου.32
145	19.0 LF Tap	e and Mask for Paint	\$0.83	\$15.77		\$15.77
146		ach Toilet / Commode	\$31.66	\$31.66		\$31.66
147	1.0 EA Res	et Toilet / Commode	\$158.97	\$158.97		\$158.97
148	1.0 EA Add	For Plastic Ring Seal for Toilet /	,	*******		V.00.0
		nmode	\$66.14	\$66.14	\$2.65	\$63.49
149	1.0 EA Ren	nove Water Supply w/Angle Stop for Toi		,	,	*******
		ommode	\$12.56	\$12.56		\$12.56
150	1.0 EA Rep	place Water Supply w/Angle Stop for Toil		,		*
		ommode	\$61.52	\$61.52	\$2.46	\$59.06
151	3.0 EA Add	for Cap Water Lines for Water Supply			*	*******
	Line	· · · ·	\$17.40	\$52.20		\$52.20
152	3.0 LF Deta	ach Vanity Cabinetry	\$21.89	\$65.67		\$65.67
153		et Vanity Cabinetry	\$88.11	\$264.33		\$264.33
	Sin	ik is on top of wood floor. Must be tached to sand/finish floors		7-2 1130		4_0
154	1.0 EA Ren	nove P-Trap	\$12.86	\$12.86		\$12.86



: Rachel Patterson

LOCATION: 1630 Mosaic Way

: Smyrna, GA 30080

COMPANY : Liberty Mutual

: PO BOX 5014

: SCRANTON, PA 18505

DATE OF REPORT

: 09/13/2022

DATE OF LOSS POLICY NUMBER

: 04/20/2022 : H3S25117765875

CLAIM NUMBER

: 049221217 & 049265223

OUR FILE NUMBER : 049221217 & 049265223 ADJUSTER NAME

: Carnesha Stanton

Estima	te Section:	Water Damage : Dwelling - Rebuild : M	ain Level : Half E	Bathroom - Conti	nued	
#	Quantity	Description	Unit Cost	RCV	DEP	ACV
155	1.0 EA	Reset P-Trap	\$33.78	\$33.78		\$33.78
156	2.0 EA	Remove Water Supply w/Angle Stop for Sink		,		,
		(Fixture only)	\$12.56	\$25.12		\$25.12
157		Replace Water Supply w/Angle Stop for Sink	\$61.52	\$123.04	\$4.92	\$118.12
158	1.0 EA	Paint / Finish Interior Door Casing / Trim Set		·	, .	• • • • • • • • • • • • • • • • • • • •
		(One Side Only) Door trim is continuous to moulding	\$11.62	\$11.62	\$3.25	\$8.37
159	1.0 EA	Detach Hollow Core Door (Door Only) Necessary to Sand and Finish Hard Wood Flooring	\$16.37	\$16.37		\$16.37
160	1.0 EA	Reset Hollow Core Door (Door Only)	\$38.66	\$38.66		\$38.66
161		Final Construction Clean-up	\$0.54	\$15.61		\$15.61
		Totals For Half Bathroom		\$1,792.76	\$71.23	\$1,721.53

Main Grouping: Sub-group #1:

Water Damage

Dwelling - Rebuild

Sub-group #2:

Main Level

Estimate Section:

Kitchen & Living Room

-	ower Perime		Floor SF:	483.70 SF	V	Vall SF: 829	.50 SF
Upper Perimeter: 92.20 LF Floor SY: 53.74 SY Ceiling SF: 483.70 SF							.70 SF
#	Quantity	Description	n	Unit Cost	RCV	DEP	ACV
162	16.0 EA	Detach and Reset Cover Pla	te for Outlet /				
		Switch		\$3.78	\$60.48		\$60.48
		To Paint Walls.					•
163	92.2 LF	Remove Shoe Moulding		\$0.63	\$58.09		\$58.09
		Must Remove to Sand and I	Finish Floors				
164		Replace Shoe Moulding		\$2.89	\$266.46	\$5.33	\$261.13
165	92.2 LF	Seal Shoe Moulding		\$0.74	\$68.23	\$1.36	\$66.87
166	92.2 LF	Paint / Finish Shoe Moulding		\$1.15	\$106.03	\$29.69	\$76.34
		Moulding is Continuous to F	oyer and Stairwell				
167	92.2 LF	Paint / Finish Base Moulding		\$1.14	\$105.11	\$29.43	\$75.68
		Moulding is Continuous to F	oyer and Stairwell				
168		Detach Hardwired Dishwash		\$27.70	\$27.70		\$27.70
169	1.0 EA	Reset Hardwired Dishwasher	•	\$195.38	\$195.38		\$195.38
170		Detach Gas Freestanding Ov		\$37.70	\$37.70		\$37.70
171	1.0 EA	Reset Gas Freestanding Over		\$135.39	\$135.39		\$135.39
		Includes detach and reset ga	as line	İ			
		connection.					
172		Detach Refrigerator		\$20.62	\$20.62		\$20.62
173	1.0 EA	Reset Refrigerator		\$99.50	\$99.50		\$99.50
		Includes Remove and Repla	ce Water Supply				
		Line for Refrigerator					



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: Smyrna, GA 30080 COMPANY : Liberty Mutual

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CLAIM NUMBER

: 049221217 & 049265223 OUR FILE NUMBER : 049221217 & 049265223

ADJUSTER NAME : Carnesha Stanton

#	ate Section: Quantity	Water Damage : Dwelling - Rebuild : Ma Description	Unit Cost	RCV	DEP	ACV
T i						
174	483.7 SF	Wood Flooring - Sand and Finish Wood Flooring is Continuous Throughout	\$4.16	\$2,012.19	\$261.58	\$1,750.61
		Main Level			i	
175	483 7 SF	Add for Dustless Sanding Equipment Wood				
	100.7 0.	Flooring - Sand and Finish	\$2.20	\$1,064.14	\$138.34	\$925.80
176	483.7 SF	Lacquer Coat for Wood Floor	\$2.24	\$1,083.49	\$140.85	\$942.64
		Two Coats	4	4 1,000110	Ψ110.00	ΨΟ 12.01
177	92.2 LF	Tape and Mask for Paint	\$0.83	\$76.53		\$76.53
178		Sand - Cabinet, Wall, 24"H	\$6.73	\$83.45		\$83.45
179		Prime & Paint - Cabinet, Wall, 24"H	\$6.99	\$84.58		\$84.58
180	829.5 SF	Paint Walls	\$1.12	\$929.04	\$260.13	\$668.91
		Walls are Continuous to Foyer and Stairwell				
181	207.4 SF	Add for Additional Paint Colors - Paint Walls	\$0.61	\$126.51	\$35.42	\$91.09
		Walls are different colors and will require				
182	492 7 SE	additional paint and materials Remove Ceiling Drywall on Wood Framing	\$1.22	ČEOO 44	j	#F00.44
102	403.7 3	Ceiling Drywall Was Compromised/Damaged	\$1.22	\$590.11		\$590.11
		by the Water.				
		The entire ceiling drywall must be removed				
		and replaced.				
		Prior to the Water-Loss, The ceiling was				
		normal/flat; after the Water-Loss, the ceiling				
		is #Wavey# due to Water Damage.				
183	3.0 EA	Add for Additional Drywall Labor to Cut Around				
		Fire Sprinklers	\$89.19	\$267.57		\$267.57
184	483.7 SF	Apply Botanical Anti-Microbial Spray (Ceiling)	\$0.51	\$246.69		\$246.69
		After Ceiling Drywall Removal. Due to water				
		exposure in ceiling cavity, the ceiling cavity				
		must be treated with a Botanical				
185	192 7 SE	Anti-Microbial Spray. Replace Ceiling Drywall on Wood Framing	\$3.17	P4 500 00	\$20.07	#4 500 00
100	703.7 31	Ceiling Drywall Was Compromised/Damaged	φ3.17	\$1,533.33	\$30.67	\$1,502.66
-		by the Water.				
		The entire ceiling drywall must be removed				
	}	and replaced.				
		Prior to the Water-Loss, The ceiling was				
		normal/flat; after the Water-Loss, the ceiling				
		is #Wavey# due to Water Damage.				
186		Seal Ceiling	\$0.55	\$266.04		\$266.04
187	483.7 SF	Paint Ceiling	\$1.26	\$609.46	\$170.65	\$438.81
		Ceiling is Continuous to Foyer and Stairwell				
188	92.2 LF	Tear Out - Crown Moulding, Keystone, Large	\$0.68	\$62.70		\$62.70
400		To remove ceiling drywall.				
189		Replace Crown Moulding, Keystone, Large	\$19.42	\$1,790.52	\$35.81	\$1,754.71
190		Inside/Outside Corner Cut for Crown Moulding	\$8.48	\$110.24	\$2.20	\$108.04
191 192		Seal Crown Moulding Paint / Finish Crown Moulding	\$1.14 \$1.4	\$105.11 \$122.77	\$2.10	\$103.01
132	32.2 LF	Moulding is Continuous to Foyer and Stairwell	\$1.44	\$132.77	\$37.18	\$95.59
193	90 F4	Remove Recessed Ceiling Light Fixture	\$8.86	\$79.74		\$79.74
.00	J.U LA	TOTAL TROOPS OF THE LIGHT I INTUIT	ψ0.00	φ/3./4		Φ19.14



: Rachel Patterson

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COMPANY: Liberty Mutual

: PO BOX 5014 : **SCRANTON**, PA 18505 DATE OF REPORT DATE OF LOSS

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: 04/20/2022 : H3S25117765875

POLICY NUMBER

: 049221217 & 049265223

CLAIM NUMBER

OUR FILE NUMBER : 049221217 & 049265223

ADJUSTER NAME : Carnesha Stanton

Estima	ite Section:	Water Damage : Dwelling - Rebuild : M	ain Level : Kitch	nen & Living Room	n - Continued	
#	Quantity	Description	Unit Cost	RCV	DEP	ACV
194	9.0 EA	Replace Recessed Ceiling Light Fixture Any electronics and light fixtures exposed to water must be replaced.	\$128.69	\$1,158.21	\$57.91	\$1,100.30
195	1.0 EA	Remove Pre-Wired Smoke Detector	\$6.20	\$6.20		\$6.20
196	1.0 EA	Replace Pre-Wired Smoke Detector Any electronics exposed to water must be replaced.	\$124.29	\$124.29		\$124.29
197	1.0 EA	Remove Chandelier	\$27.70	\$27.70		\$27.70
198	1.0 EA	Replace Chandelier	\$406.12	\$406.12		\$406.12
199		Paint / Finish Interior Door Casing / Trim Set	, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	7.00		4100112
		(One Side Only) Door trim is continuous to moulding	\$11.62	\$11.62	\$3.25	\$8.37
200	864.0 SF	Cover and Protect Cabinets and Island	\$0.34	\$293.76		\$293.76
201	483.7 SF	Final Construction Clean-up	\$0.54	\$261.20		\$261.20
	4	Totals For Kitchen & Living Room		\$14,724.00	\$1,241.90	\$13,482.10

Main Grouping: Sub-group #1:

Water Damage

Sub-group #2:

Dwelling - Rebuild Main Level

Estimate Section:

Pantry

4' 3.0" x 3' 2.0" x 9'

	ower Perime		Floor SF:	13.50 SF	٧	Vall SF: 133	.50 SF
U	Ipper Perime	ter: 14.80 LF	Floor SY:	1.50 SY	Cei	ling SF: 13	.50 SF
#	Quantity	Description		Unit Cost	RCV	DEP	ACV
202	14.8 LF	Remove Shoe Moulding		\$0.63	\$9.32		\$9.32
		Must Remove to Sand and Fi	nish Floors				
203	14.8 LF	Replace Shoe Moulding		\$2.89	\$42.77	\$0.86	\$41.91
204		Seal Shoe Moulding		\$0.74	\$10.95	\$0.22	\$10.73
205	14.8 LF	Paint / Finish Shoe Moulding		\$1.15	\$17.02	\$4.77	\$12.25
206	14.8 LF	Paint / Finish Base Moulding		\$1.14	\$16.87	\$4.72	\$12.15
207	13.5 SF	Wood Flooring - Sand and Fini	sh	\$4.16	\$56.16	\$7.30	\$48.86
		Wood Flooring is Continuous	Throughout ·				
		Main Level	~				
208	13.5 SF	Add for Dustless Sanding Equi	pment Wood				
		Flooring - Sand and Finish		\$2.20	\$29.70	\$3.86	\$25.84
209	13.5 SF	Lacquer Coat for Wood Floor		\$2.24	\$30.24	\$3.93	\$26.31
		Two Coats					
210	14.8 LF	Tape and Mask for Paint		\$0.83	\$12.28		\$12.28
211	1.0 EA	Paint / Finish Interior Door Cas	ing / Trim Set				
		(One Side Only)		\$11.62	\$11.62	\$3.25	\$8.37
		Door trim is continuous to mos	ulding				
212	1.0 EA	Detach Hollow Core Door (Doo	or Only)	\$16.37	\$16.37		\$16.37
213	1.0 EA	Reset Hollow Core Door (Door	Only)	\$38.66	\$38.66		\$38.66
214	13.5 SF	Final Construction Clean-up		\$0.54	\$7.29		\$7.29
		To	tals For Pantry		\$299.25	\$28.91	\$270.34



: Rachel Patterson LOCATION: 1630 Mosaic Way

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: Smyrna, GA 30080

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COMPANY : Liberty Mutual

CLAIM NUMBER

: 049221217 & 049265223 OUR FILE NUMBER : 049221217 & 049265223

: PO BOX 5014 : SCRANTON, PA 18505

ADJUSTER NAME

: Carnesha Stanton

Main Grouping: Sub-group #1:

Water Damage Dwelling - Rebuild Main Level

Sub-group #2: **Estimate Section:**

Stairwell to Upper Level

Stairwell to Upper Level	19' x 3' 5 0" x 17' 11 0"

	ower Perime Ipper Perime		Floor SF: Floor SY:	64.90 SF 7.21 SY	C		3.30 SF 3.90 SF
#	Quantity	Description		Unit Cost	RCV	DEP	ACV
215	1.0 EA	Detach and Reset Cover Plate for	Outlet /				
		Switch To Paint Walls.		\$3.78	\$3.78		\$3.78
216	44.8 LF	Paint / Finish Skirtboard Moulding Moulding is Continuous to Foyer N	Moulding	\$2.14	\$95.87	\$26.84	\$69.03
217	64.9 SF	Wood Flooring - Sand and Finish Wood Flooring is Continuous Thro Main Level	J	\$4.16	\$269.98	\$35.10	\$234.88
218		Add for Dustless Sanding Equipme Flooring - Sand and Finish	ent Wood	\$2.20	\$142.78	\$49.5G	¢404.00
219		Lacquer Coat for Wood Floor Two Coats	ĺ	\$2.24	\$145.38	\$18.56 \$18.90	\$124.22 \$126.48
220	44.8 LF	Tape and Mask for Paint		\$0.83	\$37.18		\$37.18
221	803.3 SF	Paint Walls Walls are Continuous to Hallway		\$1.12	\$899.70	\$251.92	\$647.78
222	64.9 SF	Final Construction Clean-up		\$0.54	\$35.05		\$35.05
		Totals For Stairwell to U	pper Level		\$1,629.72	\$351.32	\$1,278.40

Main Grouping: Sub-group #1:

Water Damage Dwelling - Rebuild Upper Level

Sub-group #2: **Estimate Section:**

Hallway

Hallway	17' 1.0" x 4' 5.0" x 9'
Offset	

	ower Perime Ipper Perime		Floor SF: Floor SY:	125.90 SF 13.99 SY	-		.50 SF .90 SF
#	Quantity	Description		Unit Cost	RCV	DEP	ACV
223	5.0 EA	Detach and Reset Cover Plate for Out	tiet /		İ		
		Switch		\$3.78	\$18.90		\$18.90
		To Paint Walls.				Ì	
224	70.5 LF	Paint / Finish Base Moulding		\$1.14	\$80.37	\$22.50	\$57.87
		Moulding is Continuous to Stairwell					
225	6.0 EA	Paint / Finish Interior Door Casing / Tr	im Set	\$11.62	\$69.72	\$19.52	\$50.20
		Door Trim is Continuous to Moulding					
226	70.5 LF	Tape and Mask for Paint		\$0.83	\$58.52		\$58.52
227	634.5 SF	Paint Walls		\$1.12	\$710.64	\$198.98	\$511.66
		Walis are Continuous to Stairwell				, i	•



: Rachel Patterson

LOCATION: 1630 Mosaic Way : Smyrna, GA 30080

COMPANY : Liberty Mutual

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CLAIM NUMBER

: 049221217 & 049265223 OUR FILE NUMBER : 049221217 & 049265223

ADJUSTER NAME : Carnesha Stanton

Estima	ate Section:	Water Damage : Dwelling - Rebuild : Up	per Level : Hall	way - Continued.	••	,
#	Quantity	Description	Unit Cost	RCV	DEP	ACV
228	125.9 SF	Final Construction Clean-up	\$0.54	\$67.99		\$67.99
		Totals For Hallway		\$1,006.14	\$241.00	\$765.14

Main Grouping: Water Damage Sub-group #1: **Dwelling - Rebuild** Sub-group #2: Upper Level **Estimate Section:** Master Bathroom

To Paint Walls. Remove Shoe Moulding \$0.63 \$23.75 \$25		iale Section:	Master Bathroom	1.0			
Upper Perimeter: 37.70 LF Floor SY: 9.86 SY Ceiling SF: 88.70 SF	Maste	er Bathroom	9' 6.0" x 9' 4	.0" x 9'			
Upper Perimeter: 37.70 LF Floor SY: 9.86 SY Ceiling SF: 88.70 SF		Lower Perime	ter: 37.70 LF Floor SF	: 88.70 S	 SF	Wall SF: 33	9.00 SF
229 7.0 EA Detach and Reset Cover Plate for Outlet / Switch To Paint Walls. \$3.78 \$26.46 \$21 \$23.75 \$23 \$37.7 LF Remove Shoe Moulding		Upper Perime	ter: 37.70 LF Floor S	': 9.86 S	SY C		
229 7.0 EA	#	Quantity	Description	Unit Cost			
Switch To Paint Walls. \$3.78 \$26.46 \$22 \$23.75 \$23 \$37.7 LF Remove Shoe Moulding \$0.63 \$23.75 \$23 \$23.75 \$23 \$37.7 LF Replace Shoe Moulding \$0.74 \$27.90 \$0.56 \$22 \$23 \$37.7 LF Seal Shoe Moulding \$1.15 \$43.36 \$12.14 \$33 \$37.7 LF Paint / Finish Shoe Moulding \$1.15 \$43.36 \$12.14 \$33 \$37.7 LF Paint / Finish Base Moulding \$1.15 \$43.36 \$12.14 \$33 \$35 \$3.0 EA Paint / Finish Interior Door Casing / Trim Set \$11.62 \$34.86 \$9.76 \$23 \$35 \$3.0 EA Detach Hollow Core Door (Door Only) \$16.37 \$16.37 \$16.37 \$37.7 LF \$37.7 LF \$37.7 LF \$39.88 \$31.29 \$339.0 SF \$39.0 SF Paint Walls \$1.12 \$379.68 \$115.98 \$37.3 \$240 \$7.0 LF Paeset Vanity Countertop \$12.25 \$85.75 \$85 \$27.3 \$261.31 \$262 \$242 \$4.0 LF Detach Backsplash (Side Pieces) \$9.66 \$38.64 \$34.16 \$34.245 \$2.0 EA Detach Faucet for (Bath) Sink \$17.08 \$34.16 \$34.265 \$85.30 \$85.30 \$38.64 \$36.25 \$36.30 \$36.25 \$36.30 \$36.25 \$36.30 \$36.25 \$36.30 \$36.25 \$36.30	229	7.0 EA	Detach and Reset Cover Plate for Outlet /				
To Paint Walls. 37.7 LF Remove Shoe Moulding Must Remove to Remove and Replace Tile Floors 37.7 LF Replace Shoe Moulding \$2.89 \$108.95 \$2.18 \$100 \$22 \$37.7 LF Seal Shoe Moulding \$0.74 \$27.90 \$0.56 \$22 \$37.7 LF Paint / Finish Shoe Moulding \$1.15 \$43.36 \$12.14 \$33 \$37.7 LF Paint / Finish Base Moulding \$1.15 \$43.36 \$12.14 \$33 \$37.7 LF Paint / Finish Base Moulding \$1.14 \$42.98 \$12.03 \$38 \$30.00 EA Paint / Finish Interior Door Casing / Trim Set Door Trim is Continuous to Moulding \$1.637 \$30.00 EA Reset Hollow Core Door (Door Only) \$38.66 \$115.98 \$37.7 LF Tape and Mask for Paint \$0.83 \$31.29 \$39.00 EP Paint Walls \$1.12 \$379.68 \$106.31 \$273 \$39.00 EP Paint Walls \$1.12 \$379.68 \$106.31 \$273 \$30.00 LF Reset Vanity Countertop \$12.25 \$85.75 \$85.75 \$38.00 LF Reset Vanity Countertop \$37.33 \$261.31 \$266 \$33.00 LF Reset Backsplash (Side Pieces) \$9.56 \$33.00 LF Reset Backsplash (Side Pieces) \$25.54 \$102.16 \$33.00 LF Reset Faucet for (Bath) Sink \$17.08 \$34.16 \$32.00 LF Reset Faucet for (Bath) Sink \$42.65 \$85.30 \$38.00 LF Reset Faucet for (Sink)				\$3.78	\$26.46		\$26.46
Must Remove to Remove and Replace Tile Floors 37.7 LF Replace Shoe Moulding 37.7 LF Seal Shoe Moulding 37.7 LF Seal Shoe Moulding 37.7 LF Paint / Finish Shoe Moulding 37.7 LF Paint / Finish Shoe Moulding 37.7 LF Paint / Finish Base Moulding 37.7 LF Paint / Finish Interior Door Casing / Trim Set Door Trim is Continuous to Moulding 38.0 EA Paint / Finish Interior Door Casing / Trim Set Door Trim is Continuous to Moulding 38.1 L62 39.0 EA Reset Hollow Core Door (Door Only) 30.0 EA Reset Hollow Core Door (Door Only) 30.0 EA Reset Hollow Core Door (Door Only) 30.0 EA Reset Hollow Core Door (Door Only) 31.15 32.18 \$108.95 \$2.18 \$108.95 \$2.18 \$108.95 \$2.18 \$109.056 \$22 \$34.36 \$12.14 \$33 \$31.29 \$34.86 \$9.76 \$22 \$34.86 \$9.76 \$22 \$34.86 \$9.76 \$22 \$34.86 \$9.76 \$25 \$34.86 \$9.76 \$25 \$34.86 \$9.76 \$25 \$34.86 \$9.76 \$25 \$34.86 \$9.76 \$25 \$34.86 \$9.76 \$25 \$34.86 \$9.76 \$25 \$34.86 \$9.76 \$25 \$34.86 \$9.76 \$35 \$35 \$35 \$35 \$35 \$35 \$35 \$3				Ψοσ	Ψ20.40		Ψ20.70
Must Remove to Remove and Replace Tile Floors	230	37.7 LF	Remove Shoe Moulding	\$0.63	\$23.75		\$23.75
231 37.7 LF Replace Shoe Moulding \$2.89 \$108.95 \$2.18 \$100.56 \$2.23 \$2.70 \$0.56 \$2.23 \$2.790 \$0.56 \$2.23 \$2.790 \$0.56 \$2.23 \$2.30 \$2.70 \$2.790 \$0.56 \$2.20 <			Must Remove to Remove and Replace Tile	, , , ,	4=00		420.70
232 37.7 LF Seal Shoe Moulding \$0.74 \$27.90 \$0.56 \$2 233 37.7 LF Paint / Finish Shoe Moulding \$1.15 \$43.36 \$12.14 \$3 234 37.7 LF Paint / Finish Base Moulding \$1.14 \$42.98 \$12.03 \$3 235 3.0 EA Paint / Finish Interior Door Casing / Trim Set Door Trim is Continuous to Moulding \$11.62 \$34.86 \$9.76 \$2 236 1.0 EA Detach Hollow Core Door (Door Only) \$16.37 \$16.37 \$16.37 \$11.2 \$3 \$3 \$11.5 \$3	231	37.7 LF		\$2.89	\$108.95	\$2.18	\$106.77
233 37.7 LF Paint / Finish Shoe Moulding \$1.15 \$43.36 \$12.14 \$3 234 37.7 LF Paint / Finish Base Moulding \$1.14 \$42.98 \$12.03 \$3 235 3.0 EA Paint / Finish Interior Door Casing / Trim Set Door Trim is Continuous to Moulding \$11.62 \$34.86 \$9.76 \$2 236 1.0 EA Detach Hollow Core Door (Door Only) \$16.37 \$16.37 \$16.37 \$11.598 <t< td=""><td>232</td><td></td><td></td><td></td><td>•</td><td></td><td>\$27.34</td></t<>	232				•		\$27.34
234 37.7 LF Paint / Finish Base Moulding \$1.14 \$42.98 \$12.03 \$34.86 235 3.0 EA Paint / Finish Interior Door Casing / Trim Set Door Trim is Continuous to Moulding \$11.62 \$34.86 \$9.76 \$25.25 236 1.0 EA Detach Hollow Core Door (Door Only) \$16.37 \$16.37 \$16.37 \$16.37 \$11.20	233				*		\$31.22
3.0 EA Paint / Finish Interior Door Casing / Trim Set Door Trim is Continuous to Moulding \$11.62 \$34.86 \$9.76 \$25.54 \$102.16 \$10.25		37.7 LF	Paint / Finish Base Moulding				\$30.95
Door Trim is Continuous to Moulding 1.0 EA Detach Hollow Core Door (Door Only) \$16.37 \$16.37 \$1237 \$3.0 EA Reset Hollow Core Door (Door Only) \$38.66 \$115.98 \$115.98 \$37.7 LF Tape and Mask for Paint \$0.83 \$31.29 \$339.0 SF Paint Walls \$1.12 \$379.68 \$106.31 \$273 \$240 7.0 LF Detach Vanity Countertop \$12.25 \$85.75	235	3.0 EA	Paint / Finish Interior Door Casing / Trim Set	\$11.62			\$25.10
237 3.0 EA Reset Hollow Core Door (Door Only) \$38.66 \$115.98 \$114 238 37.7 LF Tape and Mask for Paint \$0.83 \$31.29 \$3 239 339.0 SF Paint Walls \$1.12 \$379.68 \$106.31 \$27 240 7.0 LF Detach Vanity Countertop \$12.25 \$85.75 \$8 241 7.0 LF Reset Vanity Countertop \$37.33 \$261.31 \$26 242 4.0 LF Detach Backsplash (Side Pieces) \$9.66 \$38.64 \$3 243 4.0 LF Reset Backsplash (Side Pieces) \$25.54 \$102.16 \$10 244 2.0 EA Detach Faucet for (Bath) Sink \$17.08 \$34.16 \$3 245 2.0 EA Reset Faucet for (Sink) \$42.65 \$85.30 \$85			Door Trim is Continuous to Moulding	1			·
238 37.7 LF Tape and Mask for Paint \$0.83 \$31.29 \$329 \$39.0 SF Paint Walls \$1.12 \$379.68 \$106.31 \$273 240 7.0 LF Detach Vanity Countertop \$12.25 \$85.75 \$85 \$85.75 \$85					\$16.37		\$16.37
239 339.0 SF Paint Walls \$1.12 \$379.68 \$106.31 \$273 240 7.0 LF Detach Vanity Countertop \$12.25 \$85.75 \$85 241 7.0 LF Reset Vanity Countertop \$37.33 \$261.31 \$263 242 4.0 LF Detach Backsplash (Side Pieces) \$9.66 \$38.64 \$38.64 243 4.0 LF Reset Backsplash (Side Pieces) \$25.54 \$102.16 \$102.16 244 2.0 EA Detach Faucet for (Bath) Sink \$17.08 \$34.16 \$34.16 245 2.0 EA Reset Faucet for (Sink) \$42.65 \$85.30 \$85.30		3.0 EA	Reset Hollow Core Door (Door Only)	\$38.66	\$115.98		\$115.98
240 7.0 LF Detach Vanity Countertop \$12.25 \$85.75 \$85.75 241 7.0 LF Reset Vanity Countertop \$37.33 \$261.31 \$267 242 4.0 LF Detach Backsplash (Side Pieces) \$9.66 \$38.64 \$38.64 243 4.0 LF Reset Backsplash (Side Pieces) \$25.54 \$102.16 \$102.16 244 2.0 EA Detach Faucet for (Bath) Sink \$17.08 \$34.16 \$34.16 245 2.0 EA Reset Faucet for (Sink) \$42.65 \$85.30 \$85.30				\$0.83	\$31.29		\$31.29
241 7.0 LF Reset Vanity Countertop \$37.33 \$261.31 \$26 242 4.0 LF Detach Backsplash (Side Pieces) \$9.66 \$38.64 \$38 243 4.0 LF Reset Backsplash (Side Pieces) \$25.54 \$102.16 \$102 244 2.0 EA Detach Faucet for (Bath) Sink \$17.08 \$34.16 \$34 245 2.0 EA Reset Faucet for (Sink) \$42.65 \$85.30 \$85				\$1.12	\$379.68	\$106.31	\$273.37
242 4.0 LF Detach Backsplash (Side Pieces) \$9.66 \$38.64 \$38.64 243 4.0 LF Reset Backsplash (Side Pieces) \$25.54 \$102.16 \$102.16 244 2.0 EA Detach Faucet for (Bath) Sink \$17.08 \$34.16 \$34.16 245 2.0 EA Reset Faucet for (Sink) \$42.65 \$85.30 \$85.30		7.0 LF	Detach Vanity Countertop	\$12.25	\$85.75		\$85.75
243 4.0 LF Reset Backsplash (Side Pieces) \$25.54 \$102.16 \$102.20 244 2.0 EA Detach Faucet for (Bath) Sink \$17.08 \$34.16 \$34.20 245 2.0 EA Reset Faucet for (Sink) \$42.65 \$85.30 \$85.30				\$37.33	\$261.31		\$261.31
244 2.0 EA Detach Faucet for (Bath) Sink \$17.08 \$34.16 \$32.0 EA \$34.16				\$9.66	\$38.64		\$38.64
245 2.0 EA Reset Faucet for (Sink) \$42.65 \$85.30 \$8				\$25.54	\$102.16		\$102.16
				\$17.08			\$34.16
							\$85.30
Ψου. Επιστο συργο του στορ του στιπο το φου. Επιστο φου. Επιστο φου. Επιστο συργο το συργο το συργο το συργο τ	246			\$12.56	\$50.24		\$50.24
4.0 EA Remove and Replace Water Supply w/Angle	247						
					•	\$9.84	\$236.24
						. 1	\$12.86
				\$33.78	\$67.56	\$1.35	\$66.21
4.0 EA Add for Cap Water Lines for Water Supply	250		• • • • • • • • • • • • • • • • • • • •				
	054						\$69.60
				, , ,	- 1		\$36.72
	252	7.0 LF		\$21.89	\$153.23	1	\$153.23
The Vanity is Positioned on top of the Tile							
	253	7.0 LF		\$187.27	\$1 310 89	\$52.44	\$1,258.45



: Rachel Patterson LOCATION : 1630 Mosaic Way

DATE OF REPORT DATE OF LOSS

: 09/13/2022 : 04/20/2022

: Smyrna, GA 30080

POLICY NUMBER

: H3S25117765875 : 049221217 & 049265223

COMPANY : Liberty Mutual

CLAIM NUMBER

OUR FILE NUMBER : 049221217 & 049265223

: PO BOX 5014 : SCRANTON, PA 18505

ADJUSTER NAME

: Carnesha Stanton

#	Quantity	Description	Unit Cost	RCV	DEP	ACV
254		Tear Out Tile Flooring - Ceramic	\$3.16		DE:	
255		Tear Out Mud Base for Tile Flooring - Ceramic		\$280.29	20.40	\$280.29
256		Replace Mud Base Tile Flooring - Ceramic	\$1.93	\$171.19	\$3.42	\$167.77
257			\$6.30	\$558.81	\$11.18	\$547.63
258		Prep Floor for Tile Install Add for RedGard Waterproofing Membrane	\$0.66	\$58.54		\$58.54
	00 0.	(Floor)	\$2.93	\$259.89		\$250.00
		Necessary for waterproofing subfloors in wet	Ψ2.93	φ239.09		\$259.89
		areas before installing tile. 2 Coats				
259	88 7 SE	Replace Tile Flooring - Ceramic	\$16.19	\$1,436.05	\$28.72	64 407 00
260		Re-grout Tile Flooring - Ceramic	\$3.35	\$297.15	\$5.94	\$1,407.33
261		Apply Grout Sealer Re-grout Tile Flooring -	φυ.υυ	φ297.15	Φ 5.94	\$291.21
	00.7 01	Ceramic	\$0.74	\$65.64	\$1.31	\$64.33
262	88 7 SF	Add for Tile Sealer (Floor)	\$1.11	\$98.46	\$1.97	\$96.49
263		Tear Out Wall Tile - Ceramic Type	\$3.16	\$60.36	φι.97	\$60.48
264		Remove Durock (Cement Backer Board) for	Ψ3.10	φου.30		ф 00.30
		Wall Tile - Ceramic Type	\$0.81	\$15.47		\$15.47
		Cement Backer Board will be Compromised	Ψ0.01	Ψ10.47		ψ10.47
		when Removing Wall Tile. Must be Removed			1	
		and Replaced.				
265	19.1 SF	Replace Durock (Cement Backer Board) for				
		Wall Tile - Ceramic Type	\$5.32	\$101.61	\$2.03	\$99.58
266	19.1 SF	Add for RedGard Waterproofing Membrane	V	V.O.O 1	Ψ2.00	Ψ00.00
		(Walls)	\$2.93	\$55.96		\$55.96
		Waterproofing application under wall tile in	V	400.00		Ψ00.00
		wet locations such as shower and bathtubs. 2				
		Coats				
267	19.1 SF	Replace Wall Tile - Ceramic Type	\$18.79	\$358.89	\$7.18	\$351.71
268		Re-grout Wall Tile - Ceramic Type	\$3.35	\$63.99	\$1.28	\$62.71
269	19.1 SF	Seal Grout Wall Tile - Ceramic Type	\$0.74	\$14.13	*	\$14.13
270		Add for Tile Sealer (Wall Tile)	\$1.11	\$21.20		\$21.20
271		Remove Caulk Around Bathtub	\$27.22	\$27.22		\$27.22
272		Caulk Around Bathtub	\$31.55	\$31.55	\$8.83	\$22.72
273	1.0 EA	Cover and Protect Bathtub	\$18.47	\$18.47	\$0.74	\$17.73
274	1.0 EA	Clean Bathtub	\$39.82	\$39.82	, ,	\$39.82
		After Tile Install		·		
275	88.7 SF	Final Construction Clean-up	\$0.54	\$47.90		\$47.90
	<u></u>	Totals For Master Bathroom		\$7,488.67	\$279.21	\$7,209.46



: Rachel Patterson

LOCATION : 1630 Mosaic Way : Smyrna, GA 30080

COMPANY : Liberty Mutual

: PO BOX 5014

: **SCRANTON**, PA 18505

DATE OF REPORT

: 09/13/2022

DATE OF LOSS : 04/20/2022 POLICY NUMBER

: H3S25117765875

CLAIM NUMBER

: 049221217 & 049265223 OUR FILE NUMBER : 049221217 & 049265223

ADJUSTER NAME : Carnesha Stanton

Main Grouping: Sub-group #1:

Water Damage Dwelling - Rebuild

Sub-group #2: **Estimate Section:** Upper Level **Master Toilet**

Master Toilet 5' 1.0" x 2' 10.0" x 9'

	ower Perimet		14.40 SF	1	Vall SF: 142	2.50 SF
U	pper Perimet	ter: 15.80 LF Floor SY:	1.60 SY	Ce	iling SF: 14	l.40 SF
#	Quantity	Description	Unit Cost	RCV	DEP	ACV
276	2.0 EA	Detach and Reset Cover Plate for Outlet /				
		Switch	\$3.78	\$7.56		\$7.56
		To Paint Walls.	1	47.00		Ψ1.00
277	15.8 LF	Remove Shoe Moulding	\$0.63	\$9.95		\$9.95
		Must Remove to Remove and Replace Tile		45.55		Ψ0.00
1		Floors				
278	15.8 LF	Replace Shoe Moulding	\$2.89	\$45.66	\$0.91	\$44.75
279		Seal Shoe Moulding	\$0.74	\$11.69	\$0.23	\$11.46
280	15.8 LF	Paint / Finish Shoe Moulding	\$1.15	\$18.17	\$5.09	\$13.08
281	15.8 LF	Paint / Finish Base Moulding	\$1.14	\$18.01	\$5.04	\$12.97
282	15.8 LF	Tape and Mask for Paint	\$0.83	\$13.11	·	\$13.11
283	14.4 SF	Tear Out Tile Flooring - Ceramic	\$3.16	\$45.50		\$45.50
284	14.4 SF	Tear Out Mud Base for Tile Flooring - Ceramic	\$1.93	\$27.79	\$0.56	\$27.23
285	14.4 SF	Prep Floor for Tile Install	\$0.66	\$9.50	·	\$9.50
286	14.4 SF	Add for RedGard Waterproofing Membrane				•
	j	(Floor)	\$2.93	\$42.19		\$42.19
		Necessary for waterproofing subfloors in wet				•
		areas before installing tile. 2 Coats				
287	14.4 SF	Replace Mud Base Tile Flooring - Ceramic	\$6.30	\$90.72	\$1.81	\$88.91
288	14.4 SF	Replace Tile Flooring - Ceramic	\$16.19	\$233.14	\$4.66	\$228.48
289	14.4 SF	Re-grout Tile Flooring - Ceramic	\$3.35	\$48.24	\$0.96	\$47.28
290	14.4 SF	Apply Grout Sealer Re-grout Tile Flooring -			·	
İ		Ceramic	\$0.74	\$10.66	\$0.21	\$10.45
291	14.4 SF	Add for Tile Sealer (Floor)	\$1.11	\$15.98	\$0.32	\$15.66
292		Detach Toilet / Commode	\$31.66	\$31.66		\$31.66
293		Reset Toilet / Commode	\$158.97	\$158.97		\$158.97
294	1.0 EA	Remove Water Supply w/Angle Stop for Toilet	'			
	l ⁻	/ Commode	\$12.56	\$12.56		\$12.56
295		Replace Water Supply w/Angle Stop for Toilet				
	1	/ Commode	\$61.52	\$61.52	\$2.46	\$59.06
296	1.0 EA	Add for Cap Water Lines for Water Supply		1		r
		Lines	\$17.40	\$17.40		\$17.40
297	1.0 EA	Add For Plastic Ring Seal for Toilet /				
	-	Commode	\$66.14	\$66.14	\$2.65	\$63.49
298		Add for Rough-in for Toilet / Commode	\$151.22	\$151.22	\$3.02	\$148.20
299	1.0 EA I	Paint / Finish Interior Door Casing / Trim Set	\$11.62	\$11.62	\$3.25	\$8.37
		Door Trim is Continuous to Moulding				•
300	14.4 SF	Final Construction Clean-up	\$0.54	\$7.78	Ì	\$7.78
		Totals For Master Toilet		\$1,166.74	\$31.17	\$1,135.57



: Rachel Patterson

: PO BOX 5014

LOCATION : 1630 Mosaic Way : Smyrna, GA 30080

: SCRANTON, PA 18505

COMPANY : Liberty Mutual

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POLICY NUMBER

: H3S25117765875

CLAIM NUMBER

: 049221217 & 049265223 OUR FILE NUMBER : 049221217 & 049265223

ADJUSTER NAME

: Carnesha Stanton

Main Grouping: Sub-group #1:

Water Damage Dwelling - Rebuild

Sub-group #2: **Estimate Section:** **Upper Level Master Closet**

Lower Perimeter:

27.70 LF

Floor SF:

47.50 SF

Wall SF:

249.00 SF

Upper Perimeter:

27.70 LF

Floor SY:

5.28 SY

Ceiling SF:

47.50 SF

#	Quantity	Description	Unit Cost	RCV	DEP	ACV
301	47.5 SF	Remove Carpet Pad (Per SF)	\$0.08	\$3.80		\$3.80
302	47.5 SF	Remove Carpeting (Per SF)	\$0.24	\$11.40		\$11.40
303	47.5 SF	Replace Carpet Pad (Per SF)	\$0.83	\$39.43	\$7.89	\$31.54
304		Replace Carpeting (Per SF)	\$4.76	\$241.81	\$48.36	\$193.45
305	47.5 SF	Final Construction Clean-up	\$0.54	\$25.65	• • • • • • • • • • • • • • • • • • • •	\$25.65
		Totals For Master Closet		\$322.09	\$56.25	\$265.84

Main Grouping:

Water Damage

Sub-group #1:

Dwelling - Rebuild **Upper Level**

Sub-group #2: **Estimate Section:**

Shower Area

Shower Area 4' x 3' 2.0" x 9'

Lower Perimeter:

14.30 LF

Floor SF:

12.70 SF

Wall SF:

129.00 SF

U	pper Perime	ter: 14.30 LF Floor SY:	1.41 SY	Cei	ling SF: 12	2.70 SF
#	Quantity	Description	Unit Cost	RCV	DEP	ACV
306	32.3 SF	Paint Walls	\$1.12	\$36.18	\$10.13	\$26.05
307	12.7 SF	Prep Floor for Tile Install	\$0.66	\$8.38		\$8.38
308	12.7 SF	Add for RedGard Waterproofing Membrane		Ì		
		(Floor)	\$2.93	\$37.21		\$37.21
	~	Necessary for waterproofing subfloors in wet areas before installing tile. 2 Coats				
309		Replace Shower Pan for Shower	\$260.79	\$260.79	\$10.43	\$250.36
310		Replace Mud Base Tile Flooring - Ceramic	\$6.30	\$80.01	\$1.60	\$78.41
311	12.7 SF	Replace Tile Flooring - Ceramic	\$16.19	\$205.61	\$4.11	\$201.50
312	12.7 SF	Re-grout Tile Flooring - Ceramic	\$3.35	\$42.55	\$0.85	\$41.70
313	12.7 SF	Apply Grout Sealer Re-grout Tile Flooring -				
		Ceramic	\$0.74	\$9.40	\$0.19	\$9.21
314		Add for Tile Sealer (Floor)	\$1.11	\$14.10	\$0.28	\$13.82
315		Tear Out Wall Tile - Ceramic Type	\$3.16	\$305.89		\$305.89
316		Remove Durock (Cement Backer Board) for				
}		Wall Tile - Ceramic Type	\$0.81	\$78.41	}	\$78.41
1		Cement Backer Board will be Compromised				
		when Removing Wall Tile. Must be Removed and Replaced.				
317	96.8 SF	Replace Durock (Cement Backer Board) for				
		Wall Tile - Ceramic Type	\$5.32	\$514.98	\$10.30	\$504.68



: Rachel Patterson LOCATION : 1630 Mosaic Way

: Smyrna, GA 30080 **COMPANY**: Liberty Mutual

: PO BOX 5014

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DATE OF LOSS POLICY NUMBER

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CLAIM NUMBER

: 049221217 & 049265223 OUR FILE NUMBER : 049221217 & 049265223

ADJUSTER NAME : Carnesha Stanton

Estima	ate Section:	Water Damage : Dwelling - Rebuild : Up	per Level : Sho	wer Area - Contir	nued	
#	Quantity	Description	Unit Cost	RCV	DEP	ACV
318	96.8 SF	Add for RedGard Waterproofing Membrane (Walls) Waterproofing application under wall tile in wet locations such as shower and bathtubs. 2	\$2.93	\$283.62		\$283.62
319	06 8 SE	Coats Replace Wall Tile - Ceramic Type	\$18.79	64 949 97	# 00.00	04 700 44
320	06 0 65	Replace Wall Tile - Ceramic Type		\$1,818.87	\$36.38	\$1,782.49
321		Re-grout Wall Tile - Ceramic Type	\$3.35	\$324.28	\$6.49	\$317.79
		Seal Grout Wall Tile - Ceramic Type	\$0.74	\$71.63		\$71.63
322 323		Add for Tile Sealer (Wall Tile) Remove Soap Holder for Wall Tile - Ceramic	\$1.11	\$143.19		\$143.19
324		Type Replace Soap Holder for Wall Tile - Ceramic	\$5.69	\$5.69		\$5.69
325		Type Remove Soap Dispenser for Wall Tile - 3	\$31.31	\$31.31	\$0.63	\$30.68
		Compartments	\$4.92	\$4.92		\$4.92
326	1.0 EA	Replace Soap Dispenser for Wall Tile - 3 Compartments	\$43.91	\$43.91	\$0.88	\$43.03
327	4.0 LF	Replace Shower Curb, Site Built Tile - Ceramic	·	• •		•
328		Type Remove Better Grade Combo Faucet / Shower	\$72.12	\$288.48	\$5.77	\$282.71
329		for Bathtub Replace Better Grade Combo Faucet / Shower	\$15.08	\$15.08		\$15.08
		for Bathtub	\$192.53	\$192.53	\$7.70	\$184.83
330		Remove Best Grade Shower Head for Bathtub	\$10.05	\$10.05		\$10.05
331		Replace Best Grade Shower Head for Bathtub	\$208.61	\$208.61	\$8.34	\$200.27
332	1.0 EA	Replace Shower Drain	\$183.24	\$183.24	\$7.33	\$175.91
333		Detach Frameless Glass Shower Wall Partition	\$98.56	#00.50		
334		Reset Frameless Glass Shower Wall Partition		\$98.56	040.04	\$98.56
335		Detach and Reset Hardware for Frameless	\$255.35	\$255.35	\$10.21	\$245.14
		Glass Shower Wall Partition	\$76.21	\$76.21	\$3.05	\$73.16
336		Replace Frameless Glass Shower Door	\$287.51	\$575.02	\$23.00	\$552.02
337		Replace Hardware for Frameless Glass		•	,	•
		Shower Door	\$41.66	\$166.64	\$6.67	\$159.97
338		Caulk Around Shower	\$3.79	\$92.10	\$1.84	\$90.26
339	12.7 SF	Final Construction Clean-up	\$0.54	\$6.86		\$6.86
<u> </u>		Totals For Shower Area		\$6,489.66	\$156.18	\$6,333.48



: Rachel Patterson

LOCATION : 1630 Mosaic Way

: Smyrna, GA 30080

COMPANY : Liberty Mutual : PO BOX 5014

: SCRANTON, PA 18505

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POLICY NUMBER : 049221217 & 049265223

OUR FILE NUMBER : 049221217 & 049265223

ADJUSTER NAME : Carnesha Stanton

Main Grouping: Sub-group #1:

Water Damage Dwelling - Rebuild

Sub-group #2: **Estimate Section:** Upper Level Spare Bedroom

Spare Bedroom 13' 3.0" x 13' x 9'

Lower Perimeter:

52.50 LF

Floor SF:

172.30 SF

Wall SF:

472.50 SF

	Jpper Perimete	er: 52.50 LF Floor	SY: 19.14 SY	Cei	ling SF: 172	.30 SF
#	Quantity	Description	Unit Cost	RCV	DEP	ACV
340	5.0 EA	Detach and Reset Cover Plate for Outlet /				
		Switch	\$3.78	\$18.90		\$18.90
		To Paint Walls.		******	Ì	Ψ10.00
341		Replace Base Moulding	\$5.73	\$38.96	\$0.78	\$38.18
	1	Large Base Moulding			, , ,	455.15
342		Caulk Base Moulding	\$0.94	\$6.39	\$0.13	\$6.26
343		Seal Base Moulding	\$0.98	\$6.66	\$0.13	\$6.53
344		Paint / Finish Base Moulding	\$1.14	\$59.85	\$16.76	\$43.09
345		Tape and Mask for Paint	\$0.83	\$43.58	·	\$43.58
346		Patch Drywall Wall	\$140.78	\$281.56	\$5.63	\$275.93
347	II.	Spot Seal Walls	\$26.54	\$53.08	\$14.86	\$38.22
348	472.5 SF F		\$1.12	\$529.20	\$148.18	\$381.02
349	172.3 SF F	Remove Carpet Pad (Per SF)	\$0.08	\$13.78	,	\$13.78
350		Remove Carpeting (Per SF)	\$0.24	\$41.35		\$41.35
351	172.3 SF F	Replace Carpet Pad (Per SF)	\$0.83	\$143.01	\$28.60	\$114.41
352	184.4 SF F	Replace Carpeting (Per SF)	\$4.76	\$877.74	\$175.55	\$702.19
353	3.0 EA F	Paint / Finish Interior Door Casing / Trim Se	et \$11.62	\$34.86	\$9.76	\$25.10
354	172.3 SF F	inal Construction Clean-up	\$0.54	\$93.04		\$93.04
		Totals For Spare Bedro	om	\$2,241.96	\$400.38	\$1,841.58

Main Grouping: Sub-group #1:

Water Damage Dwelling - Rebuild

Sub-group #2: **Estimate Section:**

Upper Level **Bathroom**

Bathroom 8' 4.0" x 5' x 9'

Lower Perimeter: Upper Perimeter:

26.70 LF 26.70 LF Floor SF: Floor SY: 41.70 SF 4.63 SY

\$2.89

\$0.74

\$1.15

Wall SF: Ceiling SF: 240.00 SF 41.70 SF

ACV

\$7.56

\$16.82

\$75.62

\$19.36

\$22,11

Quantity 355 Switch 356

Description **Unit Cost RCV** DEP 2.0 EA Detach and Reset Cover Plate for Outlet / \$3.78 \$7.56 To Paint Walls. 26.7 LF Remove Shoe Moulding \$0.63 \$16.82 Must Remove to Remove and Replace Tile

Floors 26.7 LF Replace Shoe Moulding 26.7 LF Seal Shoe Moulding

26.7 LF Paint / Finish Shoe Moulding

\$77.16 \$1.54 \$19.76 \$0.40 \$30.71 \$8.60

357

358

359



: Rachel Patterson

LOCATION : 1630 Mosaic Way : Smyrna, GA 30080

COMPANY : Liberty Mutual

: PO BOX 5014

: SCRANTON, PA 18505

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POLICY NUMBER CLAIM NUMBER

: 049221217 & 049265223

OUR FILE NUMBER : 049221217 & 049265223 ADJUSTER NAME

: Carnesha Stanton

#	Quantity	Description	Unit Cost	RCV	DEP	ACV
360	4.0 LF	Replace Base Moulding	\$5.73	\$22.92	\$0.46	\$22.46
		Large Base Moulding		V	Ψ0.10	Ψ22τ
361	4.0 LF	Caulk Base Moulding	\$0.94	\$3.76	\$0.08	\$3.68
362		Seal Base Moulding	\$0.98	\$3.92	\$0.08	\$3.84
363		Paint / Finish Base Moulding	\$1.14	\$30.44	\$8.52	\$21.92
364		Tape and Mask for Paint	\$0.83	\$22.16	Ψ0.02	\$22.16
365		Paint Walls	\$1.12	\$268.80	\$75.26	\$193.54
366	41.7 SF	Tear Out Tile Flooring - Ceramic	\$3.16	\$131.77	4.0.20	\$131.77
367		Tear Out Mud Base for Tile Flooring - Ceramic	\$1.93	\$80.48	\$1.61	\$78.87
368		Prep Floor for Tile Install	\$0.66	\$27.52	*	\$27.52
369		Add for RedGard Waterproofing Membrane	,	•		72
		(Floor)	\$2.93	\$122.18		\$122.18
		Necessary for waterproofing subfloors in wet		¥ 12.2.1.2		¥
1		areas before installing tile. 2 Coats	•			
370	41.7 SF	Replace Mud Base for Tile Flooring - Ceramic	\$6.30	\$262.71	\$5.25	\$257.46
371		Replace Tile Flooring - Ceramic	\$16.19	\$675.12	\$13.50	\$661.62
372	41.7 SF	Re-grout Tile Flooring - Ceramic	\$3.35	\$139.70	\$2.79	\$136.91
373	41.7 SF	Apply Grout Sealer Re-grout Tile Flooring -		,	,	V
- 1		Ceramic	\$0.74	\$30.86	\$0.62	\$30.24
374	41.7 SF	Add for Tile Sealer (Floor)	\$1.11	\$46.29	\$0.93	\$45.36
375	1.0 EA	Detach Toilet / Commode	\$31.66	\$31.66	,	\$31.66
376	1.0 EA	Reset Toilet / Commode	\$158.97	\$158.97		\$158.97
377	1.0 EA	Remove Water Supply w/Angle Stop for Toilet		·		•
1		/ Commode	\$12.56	\$12.56		\$12.56
378	1.0 EA	Replace Water Supply w/Angle Stop for Toilet				,
		/ Commode	\$61.52	\$61.52	\$2.46	\$59.06
379	1.0 EA	Add For Plastic Ring Seal for Toilet /			•	******
- 1		Commode	\$61.52	\$61.52	\$2.46	\$59.06
380		Add for Rough-in for Toilet / Commode	\$151.22	\$151.22	\$3.02	\$148.20
381	1.0 EA	Paint / Finish Interior Door Casing / Trim Set	\$11.62	\$11.62	\$3.25	\$8.37
382		Detach Hollow Core Door (Door Only)	\$16.37	\$16.37	, -	\$16.37
383		Reset Hollow Core Door (Door Only)	\$38.66	\$38.66		\$38.66
384	3.0 LF	Detach Vanity Countertop	\$12.25	\$36.75		\$36.75
385	3.0 LF	Reset Vanity Countertop	\$37.33	\$111.99		\$111.99
386	1.0 EA	Detach Faucet for (Bath) Sink	\$17.08	\$17.08		\$17.08
387	1.0 EA	Reset Faucet for (Sink)	\$42.65	\$42.65		\$42.65
388	1.0 EA	Remove Water Supply w/Angle Stop for Sink	\$12.56	\$12.56		\$12.56
389	2.0 EA	Replace Water Supply w/Angle Stop for Sink	\$61.52	\$123.04	\$4.92	\$118.12
390		Remove P-Trap	\$12.86	\$12.86		\$12.86
391	1.0 EA	Replace P-Trap (Sink)	\$33.78	\$33.78	\$0.68	\$33.10
392	3.0 EA	Add for Cap Water Lines for Water Supply	,	•	•	******
		Lines	\$17.40	\$52.20	\$2.09	\$50.11
393	3.0 LF	Remove Vanity Cabinetry	\$21.89	\$65.67	V	\$65.67
394	3.0 LF	Replace Vanity Cabinetry	\$187.27	\$561.81	\$22.47	\$539.34
395	1.0 EA	Remove Caulk Around Bathtub	\$27.22	\$27.22		\$27.22
396	1.0 EA	Caulk Around Bathtub	\$31.55	\$31.55	\$8.83	\$22.72
397	1.0 EA	Cover and Protect Bathtub	\$18.47	\$18.47	\$0.74	\$17.73
398		Clean Bathtub	\$39.82	\$39.82	*	\$39.82
399	41.7 SF	Final Construction Clean-up	\$0.54	\$22.52		\$22.52
	,l	Totals For Bathroom		\$3,774.71		'



: Rachel Patterson

LOCATION: 1630 Mosaic Way

: Smyrna, GA 30080

COMPANY : Liberty Mutual

: PO BOX 5014 : SCRANTON, PA 18505 DATE OF REPORT DATE OF LOSS POLICY NUMBER CLAIM NUMBER

: 09/13/2022 : 04/20/2022

: H3S25117765875

: 049221217 & 049265223 OUR FILE NUMBER : 049221217 & 049265223

ADJUSTER NAME

: Carnesha Stanton

Main Grouping: Sub-group #1: **Estimate Section:** **Water Damage Dwelling - Rebuild**

General

#	Quantity	Description	Unit Cost	RCV	DEP	ACV
400		Dumpster Rental	\$768.35	\$768.35		\$768.35
401	400.0 SF	Protect Floors - Carpet Mask Upstairs Hallway and Master Bedroom are high traffic construction zones and require carpet protection.	\$0.51	\$204.00		\$204.00
		Totals For General	100	\$972.35	\$0.00	\$972.35

Repair Item Totals	\$66,394.67	\$5,320.42	\$61,074.25
General Contractor's Overhead (10.0%)	\$6,639.47	\$532.04	\$6,107,43
General Contractor's Profit (10.0%)	\$6,639.47	\$532.04	\$6,107.43
Estimate Totals With OHP	\$79,673.61	\$6,384.50	\$73,289,11
Applicable Sales Tax	\$1,333.20	\$105.30	\$1,227.90
Estimate Grand Totals	\$81,006.81	\$6,489,80	\$74,517.01
Policy Deductible	(\$1,500.00)		(\$1,500.00)
BUILDING FINAL TOTALS	\$79,506.81	× × × * *	\$73,017.01
Recoverable Depreciation		\$6,489.80	
Non-Recoverable Depreciation			



: Rachel Patterson

LOCATION : 1630 Mosaic Way

: Smyrna, GA 30080

COMPANY : Liberty Mutual : PO BOX 5014

: SCRANTON, PA 18505

DATE OF REPORT DATE OF LOSS

: 09/13/2022 : 04/20/2022

POLICY NUMBER

: H3S25117765875

CLAIM NUMBER

: 049221217 & 049265223 OUR FILE NUMBER : 049221217 & 049265223

ADJUSTER NAME : Carnesha Stanton

ESTIMATE SUMMARY DETAILS

AREA/GROUP DESCRIPTION	RCV	DEP	ACV
Building Estimate			
── Water Damage			
Dwelling - Rebuild			
Lower Level			•
Garage	\$8,404.32	\$655.22	\$7,749.10
☐ Entry from Garage	\$399.74	\$97.51	\$302.23
│ ├─ Main Level	, , , , ,	40.10.	4002.20
Entry	\$3,745.64	\$379.90	\$3,365.74
☐ Stairwell to Lower Level Entry	\$1,276.55	\$229.55	\$1,047.00
│ ├─ Foyer	\$10,362.91	\$908.58	\$9,454.33
├─ Foyer Closet	\$297.46	\$21.55	\$275.91
Half Bathroom	\$1,792.76	\$71.23	\$1,721.53
.	\$14,724.00	\$1,241.90	\$13,482.10
│	\$299.25	\$28.91	\$270.34
Stairwell to Upper Level	\$1,629.72	\$351.32	\$1,278.40
├── Upper Level			. ,
│	\$1,006.14	\$241.00	\$765.14
Master Bathroom	\$7,488.67	\$279.21	\$7,209.46
│	\$1,166.74	\$31.17	\$1,135.57
│ ├── Master Closet	\$322.09	\$56.25	\$265.84
Shower Area	\$6,489.66	\$156.18	\$6,333.48
├── Spare Bedroom	\$2,241.96	\$400.38	\$1,841.58
│	\$3,774.71	\$170.56	\$3,604.15
└─ General	\$972.35	\$0.00	\$972.35
Totals for <water damage=""></water>	\$66,394.67	\$5,320.42	\$61,074.25
Contractor O & P for <water damage=""></water>	\$13,278.94	\$1,064.08	\$12,214.86
Sales Tax for <water damage=""></water>	\$1,333.20	\$105.30	\$1,227.90
Grand Totals for <water damage=""></water>	\$81,006.81	\$6,489.80	\$74,517.01
Estimate Additional Items (Including Tax) :	\$0.00	\$0.00	\$0.00
Rounding Adjustments :	\$0.00	\$0.00	\$0.00
ESTIMATE GRAND TOTALS:	\$81,006.81	\$6,489.80	\$74,517.01

The estimate summary details displayed in the above appendix do not reflect the final estimate totals. Please refer to the Estimate Totals Page printout for the complete and final totals for this estimate.



E & S Restoration Services, LLC

Damage Restoration Specialists

FIRE * WATER * WIND * HAIL * MOLD* TREES 8841 Bright Star Rd., Douglasville, GA 30134 (678) 420-8365



Monday, September 12, 2022

Insured: Rachel Patterson	Insurance Company: Liberty Mutual Insurance
Claim: 049221217 & 049265223	Date of loss: April 20, 2022 & April 25, 2022
Loss Location: 1630 Mosaic Way Smyrna GA 30080	Peril: Water Damage

This file consists of many pages. Review the entire file.

Personal Property

E&S Restoration Services would like to thank you for the opportunity to provide our services to you. We provide the utmost in service as well as craftsmanship. We strive to make all of our projects great and pride ourselves on our knowledge and expertise in our field. Please feel free to contact me with any questions you might have regarding our services or the process in general.

Additionally, E&S Restoration Services fully reserve the right to correct, modify, revise, amend and/or supplement any information produced in error.

Respectfully,
E&S Restoration
678-420-8365
ES.RestorationLLC@gmail.com



E & S Restoration Services

8841 Bright Star Road. Douglasville, GA 30134 Phone: 678-420-8365



: Rachel Patterson

LOCATION : 1630 Mosaic Way

: Smyrna, GA 30080

COMPANY : Liberty Mutual

: PO BOX 5014

: SCRANTON, PA 18505

DATE OF REPORT DATE OF LOSS

: 09/12/2022

: 04/20/2022

POLICY NUMBER : H3S25117765875 CLAIM NUMBER

: 049221217 & 049265223 OUR FILE NUMBER : 049221217 & 049265223

ADJUSTER NAME : Carnesha Stanton

Main Grouping: Sub-group #1:

WATER DAMAGE

PACK-OUT/Storage/Pack-Back

Estimate Section: Inventory/Prep Material

#	Quantity	Description	Unit Cost	RCV	DEP	ACV
1	5.0 HR	Pickup Packing Materials & Deliver To Job				
		Site	\$60.00	\$300.00		\$300.00
2	1.0 LS	Setup Job In Computer System	\$75.00	\$75.00		\$75.00
3	13.0 RL	Bubble Wrap - Add-on cost for fragile items	\$26.40	\$343.20		\$343.20
		The items are very high quality. Additionally,	Ì			•
		there are many small, ornate, or fragile items				
		that need to be packaged delicately.				
4	11.0 RL	Rolls Stretch Wrap (1000 LF ea)	\$36.00	\$396.00		\$396.00
5	5.0 EA	Protective packing foam sheets (Packs)	\$21.98	\$109.90		\$109.90
6		Mattress Cover Bag (Plastic)	\$14.33	\$42.99		\$42.99
		Used for moving mattresses and box springs		·		*
		to the storage facility.				
		Spare Bedroom Mattress and Box Spring,				
		and main level mattress				
7	3.0 EA	Glass Divider Kit	\$14.12	\$42.36		\$42.36
8	70.0 EA	Provide HD box & tape - large size	\$15.78	\$1,104.60		\$1,104.60
		HD boxes are required for this job.				• •
		The items are very high quality. Additionally,				
		there are many small, ornate, or fragile items				
		that need to be packaged delicately.				
9	16.0 EA	Provide HD box & tape - Wardrobe Box Large	\$36.44	\$583.04		\$583.04
		Includes Metal Hanging Bar. Must beused for				
ł		clothing pack out.				
10	22.0 EA	Provide furniture blanket/pad	\$12.41	\$273.02		\$273.02
		Note: Furniture blankets are used to protect				
		large or ornate furniture during the relocation				
		process from the home, to the moving truck,				
		from the moving truck then placed in the				
		climate controlled unit.				
11	16.0 HR	Contents Inventory List with Experienced				
		Technician - per hour	\$55.11	\$881.76		\$881.76
		To maintain the integrity and character of all				
		personal property items during the pack				
		out/inventory process, one must have				
]		knowledge of the proper personal property				
1		inventorying,				
		protocols and guidelines specific to the cause				
		of origin.				
		Totals For Inventory/Prep Material		\$4,151.87	\$0.00	\$4,151.87



: Rachel Patterson

LOCATION : 1630 Mosaic Way

: Smyrna, GA 30080

COMPANY : Liberty Mutual

: PO BOX 5014

: SCRANTON, PA 18505

DATE OF REPORT DATE OF LOSS POLICY NUMBER

: 09/12/2022

: 04/20/2022

: H3S25117765875

: 049221217 & 049265223

CLAIM NUMBER

OUR FILE NUMBER : 049221217 & 049265223

ADJUSTER NAME : Carnesha Stanton

Main Grouping:

WATER DAMAGE

Sub-group #1: PACK-OUT/Storage/Pack-Back

Estimate Section: Pack-Out

#	Quantity	Description	Unit Cost	RCV	DEP	ACV
12	1.0 DY	Moving Truck (18 ' - 24') and Equipment - Per				
- 1		Day	\$370.00	\$370.00		\$370.00
13	70.0 EA	Evaluate & pack bric-a-brac - per Lg box	\$16.74	\$1,171.80		\$1,171.80
14	16.0 EA	Evaluate & pack bric-a-brac - per Wardrobe	4.0	\$1,171.00		Ψ1,171.00
-		LG box	\$18.12	\$289.92		\$289.92
15	48.0 HR	Content Manipulation charge - per hour INCLUDES: 6 Personal Property technicians for 1 day @ 8 hours each day to inspect each piece in detail, set up for inventory, wrap (in bubble-wrap, foam, stretch wrap, paper, or	\$42.82	\$2,055.36		\$2,055.36
		blankets, or a combination of materials), secure and manipulate large/ornate furniture. Note: Does not include packing boxed contents.				
16		Labor - Moving Contents to Truck/Storage from Unit (Per Hour) INCLUDES: 6 Personal Property technicians for 1 day @ 8 hours each day to move contents to the moving truck from the unit. This also includes removing not only furniture, but all boxed contents from all areas of the unit. Additionally, there are 3 flights of stairs that the technicians must move up and down with all the items. This is very labor intensive and requires extreme caution.	\$42.82	\$2,055.36		\$2,055.36
		Totals For Pack-Out		\$5,942.44	\$0.00	\$5,942.44

Main Grouping:

WATER DAMAGE

Sub-group #1: PACK-OUT/Storage/Pack-Back

Estimate Section: Storage

#	Quantity	Description	Unit Cost	RCV	DEP	ACV
17		Off-site storage - climate controlled (Per SF) 300 SQ FT for 2 Months = 600 SQ FT	\$2.52	\$1,512.00		\$1,512.00
		Totals For Storage		\$1,512.00	\$0.00	\$1,512.00



: Rachel Patterson

LOCATION : 1630 Mosaic Way

: Smyrna, GA 30080

COMPANY: Liberty Mutual

: PO BOX 5014

: SCRANTON, PA 18505

DATE OF REPORT

: 09/12/2022

DATE OF LOSS POLICY NUMBER : 04/20/2022 : H3S25117765875

CLAIM NUMBER

: 049221217 & 049265223

OUR FILE NUMBER

: 049221217 & 049265223

ADJUSTER NAME : Carnesha Stanton

Main Grouping: Sub-group #1: **WATER DAMAGE**

Estimate Section:

PACK-OUT/Storage/Pack-Back

: Wipe Down

#	Quantity	Description	Unit Cost	RCV	DEP	ACV
18		Labor - Wipe Down Items for Delivery - per hour Contents need to be wiped down during Pack-Back. Dust and Debris are inevitable during the Pack-Out Process and need to be wiped down. 6 people for 4 hours is 24 hours	\$42.82	\$1,027.68		\$1,027.68
1		Totals For Wipe Down		\$1,027.68	\$0.00	\$1.027.68

Main Grouping: Sub-group #1: **WATER DAMAGE**

PACK-OUT/Storage/Pack-Back

Estimate Section: Move Back

#	Quantity	Description	Unit Cost	RCV	DEP	ACV
19	1.0 DY	Moving Truck (18 ' - 24') and equipment - per day	\$370.00	\$370.00		\$370.00
20	48.0 HR	Labor - Moving Contents from Truck/Storage	40,0.00	Ψ070.00		Ψ370.00
		back to Unit (Per Hour)	\$42.82	\$2,055.36		\$2,055.36
		INCLUDES: 6 Personal Property technicians				
.		for 1 day @ 8 hours each day to move				
		contents from the moving truck back to the			:	
		Additionally, there are 3 flights of stairs that				
		the technicians must move up and down with				
		all the items. This is very labor intensive and				
		requires extreme caution.				
21	48.0 EA	Content Manipulation charge - per hour	\$42.82	\$2,055.36		\$2,055.36
		INCLUDES: 6 Personal Property technicians				
		for 1 day @ 8 hours each day to manipulate furniture, boxes, and equipment in the unit.				
		This includes unwrapping items and moving				
İ		trash to the trailer.				
22	70.0 EA	Unpack & Unwrap bric-a-brac - per Lg box	\$9.50	\$665.00		\$665.00
		This includes unwrapping items and moving				
23	16 O EA	trash to the trailer				
23		Unpack & Unwrap bric-a-brac - per Wardrobe Box	\$44.4E	6470.40		* 4 *** ** 4**
		This includes unwrapping items and moving	\$11.15	\$178.40		\$178.40
		trash to the trailer.				
24	6.0 HR	Electronics Setup/Reset (Per Hour)	\$56.24	\$337.44		\$337.44
		Electronic Setup/Reset is a specialized task	·			400 7777
		outside of typical content manipulation. This				
		includes troubleshooting and basic tech				
		setup. Includes drivetime				



: Rachel Patterson

LOCATION : 1630 Mosaic Way

: Smyrna, GA 30080

COMPANY : Liberty Mutual

: PO BOX 5014

: SCRANTON, PA 18505

DATE OF REPORT

: 09/12/2022

DATE OF LOSS

: 04/20/2022

POLICY NUMBER CLAIM NUMBER

: H3S25117765875 : 049221217 & 049265223

OUR FILE NUMBER : 049221217 & 049265223

ADJUSTER NAME : Carnesha Stanton

#	Quantity	Description	Unit Cost	RCV	DEP	ACV
25	1100.0 SF	Floor Masking for Floor Protection Must protect floors from moving equipment and debris/dirt brought in during pack-back.	\$0.43	\$473.00		\$473.00
26	1.0 EA	Pack Back Debris Removal We do not reuse any packing material such as boxes, blankets, plastic wrap, bubble wrap or packing paper. This must be disposed of properly. There was a large amount of packing material used for this pack-out as the items were packed very delicately.	\$375.00	\$375.00		\$375.00
		Totals For Move Back		\$6.509.56	\$0.00	\$6,509.5

Main Grouping:
Estimate Section:

WATER DAMAGE

General

#	Quantity	Description	Unit Cost	RCV	DEP	ACV
27	4.0 HR	Final Clean-up (Per Hour) Inevitable debris and small particles will be created as part of the on site unwrapping/unboxing. A technician must vacuum and sweep to clean up after pack-out.	\$42.82	\$171.28		\$171.28
28	1.0 LS	Disposable Boot or Shoe Cover	\$50.00	\$50.00		\$50.00
29		N95 Mask New Procedures Required due to Covid	\$50.00	\$50.00		\$50.00
		Totals For General	* v.	\$271.28	\$0.00	\$271.28

1		
Repair Item Totals	\$19,414.83	\$19,414.83
Estimate Grand Totals	\$19,414.83	\$19.414.83
BUILDING FINAL TOTALS	\$19,414.83	\$19,414.83
Recoverable Depreciation	• •	, ,
Non-Recoverable Depreciation		



: Rachel Patterson

LOCATION: 1630 Mosaic Way

: Smyrna, GA 30080

COMPANY : Liberty Mutual : PO BOX 5014

: SCRANTON, PA 18505

DATE OF REPORT

: 09/12/2022

DATE OF LOSS : 04/20/2022 POLICY NUMBER

: H3S25117765875

CLAIM NUMBER OUR FILE NUMBER : 049221217 & 049265223

: 049221217 & 049265223

ADJUSTER NAME : Carnesha Stanton

ESTIMATE SUMMARY DETAILS

AREA/GROUP DESCRIPTION	RCV	DEP	ACV
Building Estimate			
WATER DAMAGE			
── PACK-OUT/Storage/Pack-Back			
	\$4,151.87	\$0.00	\$4,151.87
Pack-Out	\$5,942.44	\$0.00	\$5,942.44
Storage	\$1,512.00	\$0.00	\$1,512.00
├─ Wipe Down	\$1,027.68	\$0.00	\$1,027.68
└─ Move Back	\$6,509.56	\$0.00	\$6,509.56
— General	\$271.28	\$0.00	\$271.28
Totals for <water damage=""></water>	\$19,414.83	\$0.00	\$19,414.83
Contractor O & P for <water damage=""></water>	\$0.00	\$0.00	\$0.00
— Sales Tax for <water damage=""></water>	\$0.00	\$0.00	\$0.00
Grand Totals for <water damage=""></water>	\$19,414.83	\$0.00	\$19,414.83
Estimate Additional Items (Including Tax) :	\$0.00	\$0.00	\$0.00
Rounding Adjustments :	\$0.00	\$0.00	\$0.00
ESTIMATE GRAND TOTALS:	\$19,414.83	\$0.00	\$19,414.83

The estimate summary details displayed in the above appendix do not reflect the final estimate totals. Please refer to the Estimate Totals Page printout for the complete and final totals for this estimate.

SIMSOL® EST. Summary/8.3



E & S Restoration Services, LLC

Damage Restoration Specialists

FIRE * WATER * WIND * HAIL * MOLD* TREES
8841 Bright Star Rd., Douglasville, GA 30134
(678) 420-8365



Monday, September 12, 2022

Insured: Rachel Patterson	Insurance Company: Liberty Mutual Insurance			
Claim: 049221217 & 049265223	Date of loss: April 20, 2022 & April 25, 2022			
Loss Location: 1630 Mosaic Way Smyrna GA 30080	Peril: Water Damage			

This file consists of many pages. Review the entire file.

Mold Remediation Invoice

E&S Restoration Services would like to thank you for the opportunity to provide our services to you. We provide the utmost in service as well as craftsmanship. We strive to make all of our projects great and pride ourselves on our knowledge and expertise in our field. Please feel free to contact me with any questions you might have regarding our services or the process in general.

Additionally, E&S Restoration Services fully reserve the right to correct, modify, revise, amend and/or supplement any information produced in error.

Respectfully,
E&S Restoration
678-420-8365
ES.RestorationLLC@gmail.com



E & S Restoration Services

8841 Bright Star Road. Douglasville, GA 30134 Phone: 678-420-8365

ES.RestorationLLC@gmail.com



: Rachel Patterson

LOCATION : 1630 Mosaic Way

OOMBANK

: Smyrna, GA 30080

COMPANY: Liberty Mutual

: PO Box 5014

: Scranton, PA 18505

DATE OF REPORT

: 09/12/2022

DATE OF LOSS : 04/20/2022

POLICY NUMBER

: H3S25117765875 : 049221217 & 049265223

CLAIM NUMBER OUR FILE NUMBER

\$2,821.84

\$0.00

: 049221217 & 049265223

ADJUSTER NAME : Carnesha Stanton

Main Grouping: Sub-group #1: **Water Damage**

Dwelling - Mold Remediation

Garage 12' 9.0" x 37' 1.0" x 9'

Sub-group #2: Estimate Section: Lower Level Garage

Estimate Section:

	Lower Perimeter:	86.70 LF	Floor SF:	472.80 SF	1	Nall SF:	807.00 SF
Į į	Upper Perimeter:	99.70 LF	Floor SY:	52.53 SY	Ce	iling SF:	472.80 SF
#	Quantity	Description		Unit Cost	RCV	DEP	ACV
1	Floo	/ Botanical Fungicidal (Flo or Treatment	•	\$0.96	\$453.89		\$453.89
2		Fogging and or Spray Met Botanical Fungicidal (Wa		\$0.96	\$774.72		\$774.72

\$774.72 Wall Treatment Via Fogging and or Spray Method 3 Wipe Down Walls (Mold Remediation) 807.0 SF \$0.71 \$572.97 \$572.97 Wipe Down Walls with semi-abrasive sponges, botanical wipes, and disposable towels. This is for rooms not affected by demolition. This is not for stud walls. 472.8 SF 4 Apply Botanical Fungicidal (Ceiling Treatment) \$0.96 \$453.89 \$453.89 **Ceiling Treatment** Via Fogging and or Spray Method 5 1.0 DY Hepa Air Scrubber (per 24 hour period) - No monitoring \$120.00 \$120.00 \$120.00 1 Unit for 1 Day 6 1.0 EA Hepa Filter for Hepa Air Scrubber/Negative Air Machine \$155.79 \$155.79 \$155.79 7 1.0 EA Equipment Decontamination Charge \$35.27 \$35.27 \$35.27 8 472.8 SF Construction Clean-up \$0.54 \$255.31 \$255.31

Main Grouping:

Water Damage

Sub-group #1: Sub-group #2: Estimate Section: **Dwelling - Mold Remediation**

Lower Level

Entry from Garage

Entry from Garage	6	9.	0"	x 4'	9.0"	x 9'	
-------------------	---	----	----	------	------	------	--

Lower Perimeter:	23.00 LF	Floor SF:	32.10 SF	Wall SF:	207.00 SF
Upper Perimeter:	23.00 LF	Floor SY:	3.57 SY	Ceiling SF:	32.10 SF
 T =					

Totals For Garage

#	Quantity	Description	Unit Cost	RCV	DEP	ACV
9	32.1 SF	Apply Botanical Fungicidal (Floor Treatment) Floor Treatment	\$0.96	\$30.82		\$30.82
L		Via Fogging and or Spray Method				

\$2,821.84



: Rachel Patterson

LOCATION : 1630 Mosaic Way

: Smyrna, GA 30080

: PO Box 5014

COMPANY: Liberty Mutual

: Scranton, PA 18505

DATE OF REPORT DATE OF LOSS

: 09/12/2022 : 04/20/2022

POLICY NUMBER

: H3S25117765875

CLAIM NUMBER OUR FILE NUMBER : 049221217 & 049265223

: 049221217 & 049265223

ADJUSTER NAME

: Carnesha Stanton

#	Quantity	Description	Unit Cost	RCV	DEP	ACV
10	207.0 SF	Apply Botanical Fungicidal (Wall Treatment) Wall Treatment	\$0.96	\$198.72		\$198.72
11	207.0 SF	Via Fogging and or Spray Method Wipe Down Walls (Mold Remediation) Wipe Down Walls with semi-abrasive	\$0.71	\$146.97		\$146.97
		sponges, botanical wipes, and disposable towels. This is for rooms not affected by demolition. This is not for stud walls.			ļ	
12	32.1 SF	Apply Botanical Fungicidal (Ceiling Treatment) Ceiling Treatment	\$0.96	\$30.82		\$30.82
13	32.1 SF	Via Fogging and or Spray Method Construction Clean-up	\$0.54	\$17.33	Ì	\$17.33
J.		Totals For Entry from Garage	Ψ0.0-1	\$424.66	\$0.00	\$424.66

Main Grouping:

Water Damage

Sub-group #1:

Dwelling - Mold Remediation

Sub-group #2:

Lower Level

Estim	ate Section:	Room 1					
Room	1	and the second s	12' x 11' x 9'		1.4	The second secon	***************************************
	ower Perimeter: Jpper Perimeter:	46.00 LF 46.00 LF	Floor SF: Floor SY:	132.00 SF 14.67 SY			14.00 SF 32.00 SF
#	Quantity	Descriptio	n	Unit Cost	RCV	DEP	ACV
14	Flo	ly Botanical Fungicidal (f or Treatment Fogging and or Spray M	,	\$0.96	\$126.72		\$126.72
15	414.0 SF App Wa	ly Botanical Fungicidal (\ Ill Treatment I Fogging and or Spray M	Wall Treatment)	\$0.96	\$397.44		\$397.44
16	414.0 SF Wip Wij spo tow	e Down Walls (Mold Ren be Down Walls with semi onges, botanical wipes, a rels. This is for rooms not molition. This is not for st	nediation) -abrasive nd disposable t affected by	\$0.71	\$293.94		\$293.94
17	132.0 SF App Ce	ly Botanical Fungicidal (C ling Treatment Fogging and or Spray M	Ceiling Treatment)	\$0.96	\$126.72		\$126.72
18		struction Clean-up		\$0.54	\$71.28		\$71.28
	······································	To	otals For Room 1		\$1,016.10	\$0.00	\$1,016.10



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Main Grouping:

Water Damage

Sub-group #1:

Dwelling - Mold Remediation

Sub-group #2:

Main Level

Estimate Section:

Entry

4' 9.0" x 10' 8.0" x 14' 4.0"

Lower Perimeter:

38.50 LF

Floor SF:

68.90 SF

Wall SF:

510.90 SF

ι	Jpper Perimet	er: 43.30 LF	Floor SY:	7.66 SY	Cei	iling SF:	68.90 SF
#	Quantity	Description		Unit Cost	RCV	DEP	ACV
19	68.9 SF	Apply Botanical Fungicidal (Floor Floor Treatment Via Fogging and or Spray Metho	•	\$0.96	\$66.14		\$66.14
20	510.9 SF	Apply Botanical Fungicidal (Wall Wall Treatment Via Fogging and or Spray Metho	Treatment)	\$0.96	\$490.46		\$490.46
21	510.9 SF	Wipe Down Walls (Mold Remedia Wipe Down Walls with semi-abra sponges, botanical wipes, and d towels. This is for rooms not affedemolition. This is not for stud were to the semi-abra study with the	ation) asive isposable ected by	\$0.71	\$362.74		\$362.74
22	68.9 SF	Apply Botanical Fungicidal (Ceilir Ceiling Treatment Via Fogging and or Spray Metho	ng Treatment)	\$0.96	\$66.14		\$66.14
23	68.9 SF	Construction Clean-up	· -	\$0.54	\$37.21		\$37.21
		Tot	als For Entry		\$1,022.69	\$0.00	\$1,022.69

Main Grouping:

Water Damage

Sub-group #1:

Dwelling - Mold Remediation

Sub-group #2:

Main Level

Estimate Section:

Stairwell to Lower Level Entry

Stairwell to Lower Level Entry 16' x 3' 5.0" x 10' 4.0"

Lower Perimeter: Unner Derimeter

38.80 LF 20:00 1 0 Floor SF:

54.70 SF 6 00 CV

Wall SF:

401.30 SF

'	Opper Perime	ter: 38.80 LF	Floor SY:	6.08 SY	Ce	eiling SF:	54.70 SF
#	Quantity	Description		Unit Cost	RCV	DEP	ACV
24	54.7 SF	Apply Botanical Fungicidal (Floor Floor Treatment Via Fogging and or Spray Methors	·	\$0.96	\$52.51		\$52.51
25	401.3 SF	Apply Botanical Fungicidal (Wal Wall Treatment Via Fogging and or Spray Meth	Il Treatment)	\$0.96	\$385.25		\$385.25
26	401.3 SF	Wipe Down Walls (Mold Remed Wipe Down Walls with semi-ab sponges, botanical wipes, and towels. This is for rooms not af demolition. This is not for stud	liation) orasive disposable fected by	\$0.71	\$284.92		\$284.92



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ADJUSTER NAME

: Carnesha Stanton

Estima	ate Section:	Water Damage : Dwelling - Mold Remed	liation : Main L	evel : Stairwell to	Lower Level En	try - Continue
#	Quantity	The second secon	Unit Cost	RCV	DEP	ACV
27	54.7 SF	Apply Botanical Fungicidal (Ceiling Treatment) Ceiling Treatment	\$0.96	\$52.51		\$52.51
28	54.7 SF	Via Fogging and or Spray Method Construction Clean-up	\$0.54	\$29.54		\$29.54
	3.	Totals For Stairwell to Lower Level Entry		\$804.73	\$0.00	\$804.73

Main Grouping:

Water Damage

Sub-group #1:

Dwelling - Mold Remediation

Sub-group #2:

Main Level

Estimate Section:

Foyer

Foyer

	ower Perimete Jpper Perimete		Floor SF: Floor SY:	312.60 SF 34.73 SY			639.00 SF 812.60 SF
#	Quantity	Description		Unit Cost	RCV	DEP	ACV
29		Apply Botanical Fungicidal (Fl Floor Treatment	ŕ	\$0.96	\$300.10		\$300.10
30	639.0 SF	Via Fogging and or Spray Me Apply Botanical Fungicidal (W Wall Treatment	all Treatment)	\$0.96	\$613.44		\$613.44
31	639.0 SF V	Via Fogging and or Spray Me Vipe Down Walls (Mold Reme Wipe Down Walls with semi∹ sponges, botanical wipes, an	ediation) abrasive	\$0.71	\$453.69		\$453.69
32	312.6 SF A	towels. This is for rooms not demolition. This is not for stupply Botanical Fungicidal (Cocelling Treatment	affected by d walls.	\$0.96	\$300.10		\$300.10
33	1.0 DY H	Via Fogging and or Spray Me lepa Air Scrubber (per 24 hor nonitoring 1 Unit for 1 Day		\$120.00	\$120.00		\$120.00
34	1.0 EA F	lepa Filter for Hepa Air Scrub lachine	ber/Negative Air	\$155.79	¢155.70		#455.30
35	1**	quipment Decontamination C	harge	\$35.27	\$155.79 \$35.27		\$155.79
36	312.6 SF	construction Clean-up	90	\$0.54	\$168.80		\$35.27 \$168.80



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OUR FILE NUMBER : 049221217 & 049265223

ADJUSTER NAME : Carnesha Stanton

Main Grouping:

Water Damage

Sub-group #1:

Dwelling - Mold Remediation

Sub-group #2: **Estimate Section:** Main Level **Fover Closet**

Foyer Closet 3' 4.0" x 2' 1.0" x 9'

	ower Perimete		Floor SF:	6.90 SF		Wall SF:	97.50 SF
U	Ipper Perimete	r: 10.80 LF	Floor SY:	0.77 SY	C	eiling SF:	6.90 SF
#	Quantity	Description		Unit Cost	RCV	DEP	ACV
37	F	pply Botanical Fungicidal (Fl Floor Treatment /ia Fogging and or Spray Me	•	\$0.96	\$6.62		\$6.62
38	\	pply Botanical Fungicidal (W Vall Treatment /ia Fogging and or Spray Me	·	\$0.96	\$93.60		\$93.60
39	97.5 SF W V s	lipe Down Walls (Mold Reme Vipe Down Walls with semi- ponges, botanical wipes, an owels. This is for rooms not a lemolition. This is not for stud	ediation) abrasive d disposable affected by	\$0.71	\$69.23		\$69.23
40	C	oply Botanical Fungicidal (Ce Ceiling Treatment (ia Fogging and or Spray Me	,	\$0.96	\$6.62		\$6.62
41		onstruction Clean-up		\$0.54	\$3.73		\$3.73
		Totals F	or Foyer Closet	7	\$179.80	\$0.00	\$179.80

Main Grouping: Sub-group #1:

Water Damage

Dwelling - Mold Remediation

Sub-group #2: Estimate Section:

Lower Desimeter

Main Level **Half Bathroom**

Half Bathroom	5' 6.0" x 5' 3.0" x 9'
Door	2' 6.0" x 6' 8.0"

10.00 | =

	Upper Perimeter: 19.00 LF Upper Perimeter: 21.50 LF		Floor SF: 28.90 SF Floor SY: 3.21 SY			176.80 SF 28.90 SF
#	Quantity	Description	Unit Cost	RCV	DEP	ACV
42	28.9 SF	Apply Botanical Fungicidal (Floor Treatment) Floor Treatment Via Fogging and or Spray Method	\$0.96	\$27.74		\$27.74
43	176.8 SF	Apply Botanical Fungicidal (Wall Treatment) Wall Treatment Via Fogging and or Spray Method	\$0.96	\$169.73		\$169.73
44	176.8 SF	Wipe Down Walls (Mold Remediation) Wipe Down Walls with semi-abrasive sponges, botanical wipes, and disposable towels. This is for rooms not affected by demolition. This is not for stud walls.	\$0.71	\$125.53		\$125.53

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ADJUSTER NAME : Carnesha Stanton

Estima	Estimate Section: Water Damage : Dwelling - Mold Remediation : Main Level : Half Bathroom - Continu				om - Continued	d
#	Quantity	Description	Unit Cost	RCV	DEP	ACV
45	28.9 SF	Apply Botanical Fungicidal (Ceiling Treatment) Ceiling Treatment Via Fogging and or Spray Method	\$0.96	\$27.74		\$27.74
46	28.9 SF	Construction Clean-up	\$0.54	\$15.61		\$15.61
		Totals For Half Bathroom		\$366.35	\$0.00	\$366.35

Main Grouping:

Water Damage

Sub-group #1:

Dwelling - Mold Remediation

Sub-group #2:

Main Level

Kitche	n & Living Ro	om	29' 11 N" x 18' '	2 N" y 9'			The state of the s
							
	ower Perimet		Floor SF:	483.70 SF			829.50 SF
	Jpper Perime		Floor SY:	53.74 SY	Cei	ling SF:	483.70 SF
#	Quantity	Description	1	Unit Cost	RCV	DEP	ACV
47	483.7 SF	Apply Botanical Fungicidal (Fl Floor Treatment Via Fogging and or Spray Me		\$0.96	\$464.35		\$464.35
48	829.5 SF	Apply Botanical Fungicidal (W Wall Treatment Via Fogging and or Spray Me	/all Treatment)	\$0.96	\$796.32		\$796.32
49	829.5 SF	Wipe Down Walls (Mold Reme Wipe Down Walls with semi- sponges, botanical wipes, an towels. This is for rooms not demolition. This is not for stu	ediation) abrasive d disposable affected by	\$0.71	\$588.95		\$588.95
50	483.7 SF	Apply Botanical Fungicidal (Conceiling Treatment Via Fogging and or Spray Me	eiling Treatment)	\$0.96	\$464.35		\$464.35
51		Hepa Air Scrubber (per 24 ho monitoring 1 Unit for 1 Day		\$120.00	\$120.00		\$120.00
52		Hepa Filter for Hepa Air Scrut Machine	ber/Negative Air	\$155.79	\$155.79		\$155,79
53		Equipment Decontamination (Charge	\$35.27	\$35.27		\$35.27
54		Construction Clean-up	Z.i.d. go	\$0.54	\$261.20		\$261.20
	-,	Totals For Kitchen	& Living Room		\$2,886.23	\$0.00	



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: Carnesha Stanton

Main Grouping: Sub-group #1: **Water Damage**

Dwelling - Mold Remediation

Sub-group #2: **Estimate Section:** Main Level

Pantry

Pantry 4' 3.0" x 3' 2.0" x 9'

Lower Perimeter: 14.80 LF 13.50 SF Wall SF: Floor SF: 133.50 SF 1/ 80 IE I Inner Perimeter Floor SY: 1.50 SV Ceiling SE: 13.50 SE

#	Quantity	Description	Unit Cost	RCV	DEP	ACV
55	13.5 SF	Apply Botanical Fungicidal (Floor Treatment) Floor Treatment	\$0.96	\$12.96		\$12.96
		Via Fogging and or Spray Method				
56	133.5 SF	Apply Botanical Fungicidal (Wall Treatment) Wall Treatment	\$0.96	\$128.16		\$128.16
		Via Fogging and or Spray Method		İ		
57	133.5 SF	Wipe Down Walls (Mold Remediation) Wipe Down Walls with semi-abrasive sponges, botanical wipes, and disposable towels. This is for rooms not affected by	\$0.71	\$94.79		\$94.79
		demolition. This is not for stud walls.				
58	13.5 SF	Apply Botanical Fungicidal (Ceiling Treatment) Ceiling Treatment	\$0.96	\$12.96		\$12.96
	40 5 05	Via Fogging and or Spray Method	00.54	* 7.00		^- ••
59	13.5 SF	Construction Clean-up	\$0.54	\$7.29		\$7.29
		Totals For Pantry		\$256.16	\$0.00	\$256.16

Main Grouping:

Water Damage

Sub-group #1: **Dwelling - Mold Remediation**

Sub-group #2: Main Level

Estimate Section: Stairwell to Upper Level

Stairwell to Upper Level 19' x 3' 5.0" x 17' 11.0"

44.80 LF Lower Perimeter: Floor SF: 64.90 SF Wall SF: 803.30 SF Upper Perimeter: 44.80 LF Floor SY: 7.21 SY 64.90 SF Ceiling SF: # Quantity Description **Unit Cost RCV** DEP ACV 64.9 SF Apply Botanical Fungicidal (Floor Treatment) 60 \$0.96 \$62.30 \$62.30 Floor Treatment Via Fogging and or Spray Method 803.3 SF Apply Botanical Fungicidal (Wall Treatment) 61 \$0.96 \$771.17 \$771.17

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ADJUSTER NAME : Carnesha Stanton

#	Quantity	Description	Unit Cost	RCV	DEP	ACV
63	64.9 SF	Apply Botanical Fungicidal (Ceiling Treatment) Ceiling Treatment	\$0.96	\$62.30		\$62.30
64	64.9 SF	Via Fogging and or Spray Method Construction Clean-up	\$0.54	\$35.05		\$35.0
04	04.9 SF	Totals For Stairwell to Upper Level	ఫ υ.54	\$35.05 \$1,501.16	\$0.00	\$1, :

Main Grouping:

Water Damage

Sub-group #1:

Dwelling - Mold Remediation

Sub-group #2: **Estimate Section:** Upper Level

Hallway

Hallway 17' 1.0" x 4' 5.0" x 9'

	Lower Perime	ter: 70.50 LF	Floor SF:	125.90 SF		Wall SF:	634.5	0 SF
ļ	Upper Perime	ter: 70.50 LF	Floor SY:	13.99 SY	C	Ceiling SF:	125.9	0 SF
#	Quantity	Descriptio	n	Unit Cost	RCV	DEP		ACV
65	125.9 SF	Apply Botanical Fungicidal (I Floor Treatment	•	\$0.96	\$120.86			\$120.86
66	634.5 SF	Via Fogging and or Spray M Apply Botanical Fungicidal (V	'	\$0.96	\$609.12			\$609.12
		Wall Treatment	,	,	¥000			4 000112
67	634.5 SF	Via Fogging and or Spray M Wipe Down Walls (Mold Ren		\$0.71	\$450.50			\$450.50
		Wipe Down Walls with semi sponges, botanical wipes, a towels. This is for rooms no	nd disposable t affected by		·			·
		demolition. This is not for st						
68	125.9 SF	Apply Botanical Fungicidal (Ceiling Treatment	,	\$0.96	\$120.86			\$120.86
		Via Fogging and or Spray N	lethod					
69	125.9 SF	Construction Clean-up		\$0.54	\$67.99			\$67.99
		T	otals For Hallway		\$1,369.33		0.00	\$1,369.33



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ADJUSTER NAME : Carnesha Stanton

Main Grouping: Sub-group #1:

Water Damage

Dwelling - Mold Remediation

Sub-group #2: **Estimate Section:** Upper Level **Master Bedroom**

Master Bedroom 15' x 17' x 9'

Lower Perimeter:

64 00 LF

Floor SF:

255 00 SE

Wall SE

576 AA SE

	ower remined			,	wall Sr:	5/6.00 SF
U	pper Perimete	er: 64.00 LF Floor	SY: 28.33 SY	Ce	iling SF:	255.00 SF
#	Quantity	Description	Unit Cost	RCV	DEP	ACV
70		Apply Botanical Fungicidal (Floor Treatme Floor Treatment	nt) \$0.96	\$244.80		\$244.80
71	576.0 SF	Via Fogging and or Spray Method Apply Botanical Fungicidal (Wall Treatmer Wall Treatment	t) \$0.96	\$552.96		\$552.96
72	576.0 SF \	Via Fogging and or Spray Method Vipe Down Walls (Mold Remediation) Wipe Down Walls with semi-abrasive	\$0.71	\$408.96		\$408.96
		sponges, botanical wipes, and disposable towels. This is for rooms not affected by demolition. This is not for stud walls.		,		
73		Apply Botanical Fungicidal (Ceiling Treatm Ceiling Treatment Via Fogging and or Spray Method	ent) \$0.96	\$244.80		\$244.80
74		Construction Clean-up	\$0.54	\$137.70		\$137.70
		Totals For Master Bedro	oom	\$1,589.22	\$0.	.00 \$1,589.22

Main Grouping:

Water Damage

Sub-group #1:

Dwelling - Mold Remediation

Sub-group #2: **Estimate Section:**

Upper Level Master Bathroom

Master Bathroom 9' 6.0" x 9' 4.0" x 9'

Lower	Perimeter:
Upper	Perimeter:

37.70	ᄕ
37.70	LF

LIO	OL	51	
Flo	or:	SY	' :

88.70	SF
9.86	SY

waii	SF:
Ceiling	SF:

339.00 SF

l	Jpper Perimeter:	37.70 LF	Floor SY:	9.86 SY	Ce	iling SF:	88.70 SF
#	Quantity	Description	n	Unit Cost	RCV	DEP	ACV
75	F	ply Botanical Fungicidal (Floor Treatment	•	\$0.96	\$85.15		\$85.15
76	339.0 SF Ap	Via Fogging and or Spray Method pply Botanical Fungicidal (Wall Treatment) Wall Treatment Via Fogging and or Spray Method		\$0.96	\$325.44		\$325.44
77	339.0 SF Wi W sp to	pe Down Walls (Mold Rem lipe Down Walls with semi- conges, botanical wipes, a wels. This is for rooms not emolition. This is not for st	nediation) -abrasive nd disposable : affected by	\$0.71	\$240.69		\$240.69



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ADJUSTER NAME : Carnesha Stanton

Estimate Section:		Water Damage : Dwelling - Mold Remediation : Upper Level : Master Bathroom - Continued					
#	Quantity	Description	Unit Cost	RCV	DEP	ACV	
78	88.7 SF	Apply Botanical Fungicidal (Ceiling Treatment) Ceiling Treatment Via Fogging and or Spray Method	\$0.96	\$85.15		\$85.15	
79	1.0 DY	Hepa Air Scrubber (per 24 hour period) - No monitoring 1 Unit for 1 Day	\$120.00	\$120.00		\$120.00	
80		Hepa Filter for Hepa Air Scrubber/Negative Air Machine	\$155.79	\$155.79		\$155.79	
81	1.0 EA	Equipment Decontamination Charge	\$35.27	\$35.27		\$35.27	
82		Construction Clean-up	\$0.54	\$47.90		\$47.90	
		Totals For Master Bathroom		\$1,095.39	\$0.00	\$1,095.39	

Main Grouping:

Water Damage

Sub-group #1:

Dwelling - Mold Remediation

Sub-group #2: Estimate Section:

Upper Level Master Toilet

/laster	Toilet		5' 1.0" x 2' 10.0)" x 9'			
L	ower Perimeter:	15.80 LF	Floor SF:	14.40 SF		Wall SF:	142.50 SF
U	pper Perimeter:	15.80 LF	Floor SY:	1.60 SY	Ce	eiling SF:	14.40 SF
#	Quantity	Descriptio	n	Unit Cost	RCV	DEP	ACV
83	Floor	Botanical Fungicidal (F Treatment ogging and or Spray M	,	\$0.96	\$13.82		\$13.82
84	142.5 SF Apply Wall	Botanical Fungicidal (V Treatment ogging and or Spray M	Vall Treatment)	\$0.96	\$136.80		\$136.80
85	142.5 SF Wipe Wipe spong towel	Down Walls (Mold Rem Down Walls with semi- ges, botanical wipes, a s. This is for rooms not dition. This is not for sti	nediation) -abrasive nd disposable : affected by	\$0.71	\$101.18		\$101.18
86	14.4 SF Apply Ceilir	Botanical Fungicidal (C g Treatment ogging and or Spray M	Ceiling Treatment)	\$0.96	\$13.82		\$13.82
87		uction Clean-up		\$0.54	\$7.78		\$7.78
		Totals I	or Master Toilet		\$273.40	\$0.0	0 \$273.40



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ADJUSTER NAME

OUR FILE NUMBER : 049221217 & 049265223

Main Grouping: Sub-group #1:

Water Damage

Dwelling - Mold Remediation

Sub-group #2: **Estimate Section:** **Upper Level Master Closet**

Master Closet 7' 6.0" x 6' 4.0" x 9'

Lower	Dorimotore	27 70 1 5	CI C	ъ.	
			 		_
			 		•

	ower Perimete Jpper Perimete		Floor SF: Floor SY:	47.50 SF 5.28 SY		Wall SF: iling SF:	249.00 SF 47.50 SF
#	Quantity	Description	n	Unit Cost	RCV	DEP	ACV
88		Apply Botanical Fungicidal (F Floor Treatment Via Fogging and or Spray M	•	\$0.96	\$45.60		\$45.60
89	249.0 SF	Apply Botanical Fungicidal (V Wall Treatment Via Fogging and or Spray M	Vall Treatment)	\$0.96	\$239.04		\$239.04
90	249.0 SF V	Via r ogging and or spray in Wipe Down Walls (Mold Rem Wipe Down Walls with semisponges, botanical wipes, altowels. This is for rooms not demolition. This is not for stu	nediation) -abrasive nd disposable affected by	\$0.71	\$176.79		\$176.79
91	47.5 SF	Apply Botanical Fungicidal (C Ceiling Treatment Via Fogging and or Spray M	ceiling Treatment)	\$0.96	\$45.60		\$45.60
92		Construction Clean-up		\$0.54	\$25.65		\$25.65
	7	Totals F	or Master Closet		\$532.68	\$0.0	0 \$532.68

Main Grouping:

Water Damage

Sub-group #1:

Dwelling - Mold Remediation

Sub-group #2: **Estimate Section:** **Upper Level Shower Area**

Shower Area	4' x 3' 2.0" x 9'
-------------	-------------------

	Lower Perime Upper Perime		Floor SF: Floor SY:	12.70 SF 1.41 SY		Wall SF: iling SF:	129.00 SF 12.70 SF
#	Quantity	Description	n	Unit Cost	RCV	DEP	ACV
93	12.7 SF	Apply Botanical Fungicidal (Floor Treatment Via Fogging and or Spray N	Í	\$0.96	\$12.19		\$12.19
94	129.0 SF	Apply Botanical Fungicidal (Wall Treatment Via Fogging and or Spray N	Wall Treatment)	\$0.96	\$123.84		\$123.84
95	129.0 SF	Wipe Down Walls (Mold Rer Wipe Down Walls with sem sponges, botanical wipes, a towels. This is for rooms no demolition. This is not for st	nediation) i-abrasive and disposable it affected by	\$0.71	\$91.59		\$91.59



: Rachel Patterson

LOCATION: 1630 Mosaic Way

: Smyrna, GA 30080

COMPANY : Liberty Mutual : PO Box 5014

: Scranton, PA 18505

DATE OF REPORT

: 09/12/2022

DATE OF LOSS

: 04/20/2022

POLICY NUMBER

: H3S25117765875 : 049221217 & 049265223

CLAIM NUMBER OUR FILE NUMBER

: 049221217 & 049265223

ADJUSTER NAME : Carnesha Stanton

Estimate Section:		Water Damage : Dwelling - Mold Remediation : Upper Level : Shower Area - Continued							
#	Quantity	Description	Unit Cost	RCV	DEP	ACV			
96	12.7 SF	Apply Botanical Fungicidal (Ceiling Treatment) Ceiling Treatment Via Fogging and or Spray Method	\$0.96	\$12.19		\$12.19			
97	12.7 SF	Construction Clean-up	\$0.54	\$6.86		\$6.86			
	P	Totals For Shower Area		\$246.67	\$0.00	\$246.67			

Main Grouping:

Water Damage

Sub-group #1:

Dwelling - Mold Remediation

Sub-group #2:

Upper Level

Estimate Section:

Spare Bedroom

L	ower Perime	ter: 52.50 LF	Floor SF:	172.30 SF	V	Vall SF: 472	2.50 SF
U	pper Perime	ter: 52.50 ĻF	Floor SY:	19.14 SY	Cei	ling SF: 172	.30 SF
#	Quantity	Description		Unit Cost	RCV	DEP	ACV
98	172.3 SF	Apply Botanical Fungicidal (Fl Floor Treatment Via Fogging and or Spray Me	,	\$0.96	\$165.41		\$165.41
99.	472.5 SF	Apply Botanical Fungicidal (W Wall Treatment Via Fogging and or Spray Me	all Treatment)	\$0.96	\$453.60		\$453.60
100	472.5 SF	Wipe Down Walls (Mold Rema Wipe Down Walls with semi- sponges, botanical wipes, an towels. This is for rooms not demolition. This is not for stu-	ediation) abrasive d disposable affected by	\$0.71	\$335.48		\$335.48
101	172.3 SF	Apply Botanical Fungicidal (Co Ceiling Treatment Via Fogging and or Spray Me	eiling Treatment)	\$0.96	\$165.41		\$165.41
102	172.3 SF	Construction Clean-up		\$0.54	\$93.04		\$93.04
		Totals For	Spare Bedroom		\$1,212,94	\$0.00	\$1,212.94

Main Grouping:

Water Damage

Sub-group #1:

Dwelling - Mold Remediation

Sub-group #2:

Upper Level

Estimate Section:

Bathroom

Bathroom

...... 8' 4.0" x 5' x 9'

Lower Perimeter: **Upper Perimeter:** 26.70 LF 26.70 LF Floor SF:

41.70 SF

Wall SF:

240.00 SF

#

Floor SY:

4.63 SY

Ceiling SF:

41.70 SF

Quantity

RCV

Description

Unit Cost

DEP

ACV



: Rachel Patterson

LOCATION : 1630 Mosaic Way

: Smyrna, GA 30080 COMPANY : Liberty Mutual

: PO Box 5014 : Scranton, PA 18505 DATE OF REPORT DATE OF LOSS POLICY NUMBER

CLAIM NUMBER

: 09/12/2022 : 04/20/2022

: H3S25117765875

: 049221217 & 049265223 OUR FILE NUMBER : 049221217 & 049265223

ADJUSTER NAME : Carnesha Stanton

Estima	te Section:	Water Damage : Dwelling - Mold Remed	iation : Upper L	evel : Bathroom	- Continued	
#	Quantity	Description	Unit Cost	RCV	DEP	ACV
103	41.7 SF	Apply Botanical Fungicidal (Floor Treatment) Floor Treatment	\$0.96	\$40.03		\$40.03
104	240.0 SF	Via Fogging and or Spray Method Apply Botanical Fungicidal (Wall Treatment) Wall Treatment Via Fogging and or Spray Method	\$0.96	\$230.40		\$230.40
105	240.0 SF	Via Fogging and or Spray Method Wipe Down Walls (Mold Remediation) Wipe Down Walls with semi-abrasive sponges, botanical wipes, and disposable towels. This is for rooms not affected by	\$0.71	\$170.40		\$170.40
106	41.7 SF	demolition. This is not for stud walls. Apply Botanical Fungicidal (Ceiling Treatment) Ceiling Treatment Via Fogging and or Spray Method	\$0.96	\$40.03		\$40.03
107		Hepa Air Scrubber (per 24 hour period) - No monitoring 1 Unit for 1 Day	\$120.00	\$120.00		\$120.00
108		Hepa Filter for Hepa Air Scrubber/Negative Air Machine	\$155.79	\$ 155.79		\$155.79
109		Equipment Decontamination Charge	\$35.27	\$35.27		\$35.27
110		Construction Clean-up	\$0.54	\$22.52		\$22.52
- '		Totals For Bathroom		\$814.44	\$0.00	\$814.44

Main Grouping:

Water Damage

Sub-group #1:

Dwelling - Mold Remediation

Via Fogging and or Spray Method

Sub-group #2: **Estimate Section:**

Upper Level Bedroom 2

Bedroo	om 2		13' 2.0" x 13' 1	.0" x 9'			
	ower Perimeter:	52.50 LF	Floor SF:	172.30 SF		Vall SF:	472.50 SF
U	pper Perimeter:	52.50 LF	Floor SY:	19.14 SY	Cei	iling SF:	172.30 SF
#	Quantity	Description	n	Unit Cost	RCV	DEP	ACV
111	Floo	Botanical Fungicidal (F r Treatment Fogging and or Spray M	·	\$0.96	\$165.41		\$165.41
112	472.5 SF Apply Wall	Botanical Fungicidal (V Treatment Fogging and or Spray M	Vall Treatment)	\$0.96	\$453.60		\$453.60
113	472.5 SF Wipe Wipe spon towe	Down Walls (Mold Reme Down Walls (Mold Reme Down Walls with semiges, botanical wipes, als. This is for rooms not polition. This is not for str	nediation) -abrasive nd disposable affected by	\$0.71	\$335.48		\$335.48
114	172.3 SF Apply	Botanical Fungicidal (C ng Treatment		\$0.96	\$165.41		\$165.41



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POLICY NUMBER CLAIM NUMBER

: H3S25117765875 : 049221217 & 049265223

OUR FILE NUMBER : 049221217 & 049265223

ADJUSTER NAME : Carnesha Stanton

Estima	stimate Section: Water Damage : Dwelling - Mold Remediation : Upper Level : Bedroom 2 - Continued						
#	Quantity	Description	Unit Cost	RCV	DEP	ACV	
115	172.3 SF	Construction Clean-up	\$0.54	\$93.04		\$93.04	
	a	Totals For Bedroom 2		\$1,212.94	\$0.00	\$1,212.94	

Main Grouping:

Water Damage

Sub-group #1:

Dwelling - Mold Remediation

Estimate Section: General

#	Quantity	Description	Unit Cost	RCV	DEP	ACV
116	1.0 EA	Debris Removal	\$125.00	\$125.00		\$125.00
117	3.0 EA	(Post-REM) Mold Clearance Test - Per Sample Mold Spore Trap, 24-hour Analysis (Ea.) This includes laboratory fee, Sample collection fee and mailing/delivery fee. 3 samples were collected before the mold treatment and 3 samples collected after the mold treatment.	\$90.00	\$270.00		\$270.00
118	3.0 EA	(PRE-REM) Initial Mold Test - Per Sample Includes lab fees, set up, sample mailing/transportation	\$90.00	\$270.00		\$270.00
119	1.0 EA	Mold, Visual Assessment, During Hours For initial mold inspection (Pre-REM)	\$325.00	\$325.00		\$325.00
120	6.0 EA	HD Disposable Chemical Gloves (Per Pair)	\$2.50	\$15.00		\$15.00
121	3.0 EA	N95 Respirator w/Exhalation Valve Mask	\$36.00	\$108.00		\$108.00
122	3.0 EA	Tyvek Suit	\$15.00	\$45.00		\$45.00
123	1.0 EA	HVAC Duct Cleaning	\$550.00	\$550.00		\$550.00
		Totals For General		\$1,708.00	\$0.00	\$1,708.00

Repair Item Totals	\$23,481.92	\$23,481.92
Estimate Grand Totals	\$23,481.92	\$23,481.92
BUILDING FINAL TOTALS	\$23,481.92	\$23,481.92
Recoverable Depreciation		
Non-Recoverable Depreciation	¥	



: Rachel Patterson

LOCATION : 1630 Mosaic Way

COMPANY : Liberty Mutual

: Smyrna, GA 30080

: PO Box 5014 : Scranton, PA 18505 DATE OF REPORT DATE OF LOSS

ADJUSTER NAME

: 09/12/2022 : 04/20/2022

POLICY NUMBER : H3S25117765875 CLAIM NUMBER : 049221217 & 049265223

OUR FILE NUMBER : 049221217 & 049265223 : Carnesha Stanton

ESTIMATE SUMMARY DETAILS

AREA/GROUP DESCRIPTION	RCV	DEP	ACV
Building Estimate			•
☐ Water Damage			
→ Dwelling - Mold Remediation			
Lower Level			
│	\$2,821.84	\$0.00	\$2,821.84
│	\$424.66	\$0.00	\$424.66
Room 1	\$1,016.10	\$0.00	\$1,016.10
│		•	7 - 7
│	\$1,022.69	\$0.00	\$1,022.69
Stairwell to Lower Level Entry	\$804.73	\$0.00	\$804.73
│	\$2,147.19	\$0.00	\$2,147.19
│	\$179.80	\$0.00	\$179.80
Half Bathroom	\$366.35	\$0.00	\$366.35
Kitchen & Living Room	\$2,886.23	\$0.00	\$2,886.23
│	\$256.16	\$0.00	\$256.16
Stairwell to Upper Level	\$1,501.16	\$0.00	\$1,501.16
│			
│	\$1,369.33	\$0.00	\$1,369.33
Master Bedroom	\$1,589.22	\$0.00	\$1,589.22
Master Bathroom	\$1,095.39	\$0.00	\$1,095.39
	\$273.40	\$0.00	\$273.40
│	\$532.68	\$0.00	\$532.68
│	\$246.67	\$0.00	\$246.67
Spare Bedroom	\$1,212.94	\$0.00	\$1,212.94
Bathroom	\$814.44	\$0.00	\$814.44
Bedroom 2	\$1,212.94	\$0.00	\$1,212.94
General	\$1,708.00	\$0.00	\$1,708.00
Totals for <water damage=""></water>	\$23,481.92	\$0.00	\$23,481.92
Contractor O & P for <water damage=""></water>	\$0.00	\$0.00	\$0.00
Sales Tax for <water damage=""></water>	\$0.00	\$0.00	\$0.00
Grand Totals for <water damage=""></water>	\$23,481.92	\$0.00	\$23,481.92
Estimate Additional Items (Including Tax) :	\$0.00	\$0.00	\$0.00
Rounding Adjustments :	\$0.00	\$0.00	\$0.00
ESTIMATE GRAND TOTALS:	\$23,481.92	\$0.00	\$23,481.92

The estimate summary details displayed in the above appendix do not reflect the final estimate totals. Please refer to the Estimate Totals Page printout for the complete and final totals for this estimate.

IN THE STATE COURT OF GWINNETT COUNTY STATE OF GEORGIA

RACHEL PATTERSON	60 M A
Plaintiff,) Civil Action No.
V.)
LIBERTY MUTUAL INSURANCE COMPANY) JURY TRIAL DEMANDED)
Defendant,))

VERIFICATION

Personally appeared, Rachel Patterson, affiant, before me, the undersigning attesting officer authorized to administer oaths, and who, after being duly sworn, deposes and states that the facts contained in the within and foregoing COMPLAINT are true and correct to the best of affiant's personal knowledge and belief.

Rachel Patterson

Sworn to and subscribed before me this 20th day of February 2023

Notary Public

LOCAL RULE 7.1 CERTIFICATE

The undersigned counsel hereby certifies that this pleading was prepared with one of the font and point selections approved by the Court in L.R. 5.1.C. Specifically, Times New Roman was used in 14 point.

/s/ Hilary W. Hunter
Hilary W. Hunter
Georgia Bar No. 742696
Isenberg & Hewitt, P.C.
600 Embassy Row, Suite 150
Atlanta, Georgia 30328
770-351-4400 - T
Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

RACHEL PATTERSON)	
)	
Plaintiff,)	
)	Civil Action No.
v.)	
)	
LIBERTY MUTUAL INSURANCE)	
COMPANY)	

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 29, 2023, she electronically filed a copy of Defendant Liberty Mutual Insurance Company's Notice of Removal with the United States District Court's Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to the following attorneys:

Ryan Baxter Baxter Law Firm, LLC 2400 Herodian Way, Suite 220 Smyrna, GA 30080

ISENBERG & HEWITT, P.C.

/s/ Hilary W. Hunter
Hilary W. Hunter
Georgia Bar No. 742696
600 Embassy Row, Suite 150
Atlanta, GA 30328
770-351-4400 - O
Attorney for Defendant